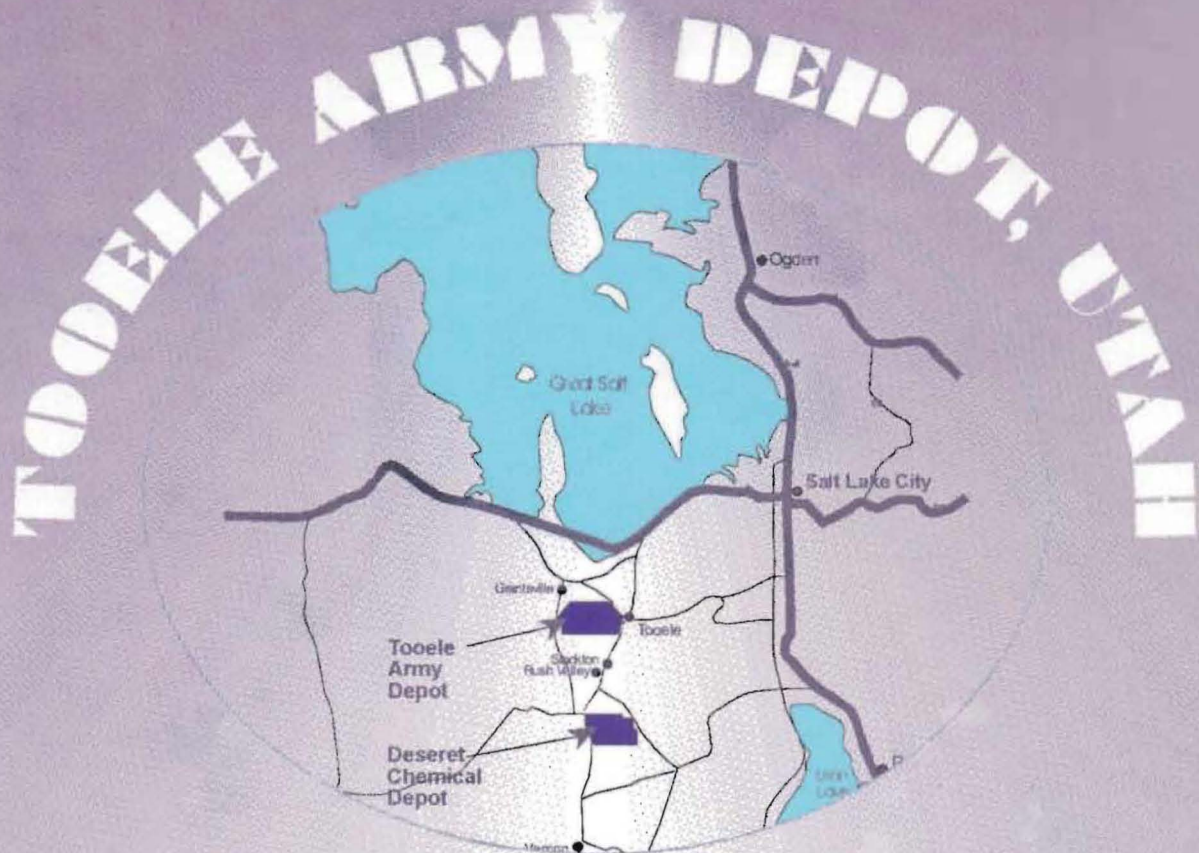


Final Site Characterization Report for Closure of Building 659 Polychlorinated Biphenyls Storage Area

PCDR \ PCDR 7 \ TOOLE AD \
FINAL \ 102610 \ TOE100177



14 March 1997

Prepared by:

JE JACOBS ENGINEERING

Prepared for:

**U. S. Army
Corps of Engineers**



Review Comments from USEPA, dated 04 November 1996 (by Floyd Nichols).

Jacobs Engineering Group Inc. 1996. *Draft Site Characterization Report for Closure of Building 659 Polychlorinated Biphenyls Storage Area*. 21 August.

GENERAL COMMENTS:

Comment #1 Overall the document(s) clearly state (s) the objectives, regulatory guidance and cleanup criteria used, and conclusions.

Response #1 No response required.

PCB Area:

Comment #2 Analysis of fresh samples, collected from the affected PCB-contaminated area, will determine the adequacy or efficacy of floor washing. Based on an evaluation of those samples, the BCT may need to meet and consider TEAD recommendations for further action(s) (repeated washing(s), another remediation method, etc.).

Response #2 JE agrees. Following floor washing, surface wipe sample results will indicate if the affected surfaces are within the PCB surface concentration limits ($10 \mu\text{g}/100 \text{ cm}^2$) allowed for nonrestricted use. Additional actions may be required for a nonrestricted use clearance.

**FINAL SITE CHARACTERIZATION REPORT
FOR
CLOSURE OF BUILDING 659
POLYCHLORINATED BIPHENYLS STORAGE AREA
TOOELE ARMY DEPOT, UTAH**

Prepared for:
**DEPARTMENT OF THE ARMY
UNITED STATES ARMY DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J Street
Sacramento, California 95814-2922**
and
**TOOELE ARMY DEPOT
ENVIRONMENTAL MANAGEMENT DIVISION (SDSTE-IRE)
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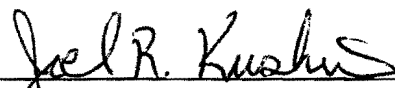
Contract No. DACA05-92-D-0040, Delivery Order 19


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14 March 1997

FINAL SITE CHARACTERIZATION REPORT
FOR
CLOSURE OF BUILDING 659
POLYCHLORINATED BIPHENYLS STORAGE AREA
TOOELE ARMY DEPOT, UTAH

14 March 1997


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Federal Contract No. DACA 05-92-D-0040
Delivery Order No. 019

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ATTACHMENTS

Attachment 1	Historical Records Search
Attachment 2	Weekly Field and Laboratory Quality Control Report
Attachment 3	Raw Data and Laboratory Reports

ACRONYMS AND ABBREVIATIONS

µg	micrograms
°C	degrees centigrade
ASTM	American Society for Testing and Materials
BRAC	Base Realignment and Closure
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
cm ²	square centimeter
COC	chain of custody
DCB	decachlorobiphenyl
DI	deionized
DOT	U.S. Department of Transportation
DRMO	Defense Reutilization and Marketing Office
EPA	U.S. Environmental Protection Agency
FD	Field Duplicate
FFA	Federal Facilities Agreement
FSP	Field Sampling Plan
HSP	Health and Safety Plan
ID	identification
IDW	investigation-derived waste
Jacobs	Jacobs Engineering Group Inc.
mg/kg	milligrams per kilogram
MS/MSD	Matrix Spike/Matrix Spike Duplicate
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NPL	National Priorities List
NRC	U.S. Nuclear Regulatory Commission
OSWER	Office of Solid Waste and Emergency Response
OU	Operable Unit
PCB	polychlorinated biphenyl
PPE	personal protective equipment
ppm	parts per million

QA	quality assurance
QAPP	Quality Assurance Project Plan
QC	quality control
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
SOW	Scope of Work
SPDL	South Pacific Division Laboratory
SWMU	Solid Waste Management Unit
TEAD	Tooele Army Depot
TCX	tetrachloro-1,3-xylene
TM	Technical Manager
TSCA	Toxic Substances Control Act
UDEQ	Utah Department of Environmental Quality
USACE	United States Army Corps of Engineers
VOA	volatile organic analyte
Work Plan	Site Survey Work Plan
WPS	Work Plan Summary

EXECUTIVE SUMMARY

Three types of transformers are known to have been stored within the Building 659 PCB Storage Area, Solid Waste Management Unit 33 (SWMU 33)/Operable Unit 5 (OU 5)—non-PCB transformers (0-50 ppm); PCB-contaminated transformers (50-500 ppm); and PCB transformers (> 500 ppm). Minor spills and subsequent cleanup have been documented. The purpose of this investigation was to characterize the site and provide a basis for its ultimate release for unrestricted use.

Samples were collected from the concrete floor, wood walls, and masonry walls of the PCB Storage Area; composited; and analyzed for the presence of residual PCB contamination. The following results were obtained:

- Total PCBs were found in discrete concrete core samples at concentrations as high as 7.1 mg/kg.
- Analysis of composite samples indicated that no single sample result could have exceeded the non-restricted use criterion of 10 ppm (soil).
- Certain stained areas of the wood walls revealed PCB contamination at sub-ppm levels.
- No evidence of PCBs was found within the masonry wall.

Definitive evidence of past PCB releases within the PCB Storage Area has been obtained. Since concrete is defined as a non-impervious surface (40CFR, Section 761.123), the highest discrete concrete core sample concentration of 7.1 mg/kg was compared to the soil limit of 25 mg/kg (restricted use) and 10 mg/kg (nonrestricted use). Based on these results, removal of contaminated concrete need not be considered. The definitive existence of PCBs require that the surface concentrations in the contaminated areas meet the solid surface maximum level of 10 $\mu\text{g}/100 \text{ cm}^2$ for nonrestricted use.

It is recommended the floor and stained areas of the walls be cleaned to remove surface PCB contamination and then tested with wipe surface samples. Once the wipe sample results show floor and wall surfaces meet the standard, the PCB storage area of the building can be released for nonrestricted use.

The further task of designing an approved remedial action will be required. A recommended course of action following EPA guidance is discussed. The remedial design will include the

preparation of plans and specifications for implementation of remedial action by a designated remedial action contractor contracted by USACE, Sacramento District.

1. INTRODUCTION

The United States Army Corps of Engineers (USACE), Sacramento District, has contracted with Jacobs Engineering Group Inc. (Jacobs) for the site characterization sampling for closure of a Polychlorinated Biphenyl (PCB) Storage Area located in Building 659 at Tooele Army (TEAD), Tooele, Utah (Figures 1-1 through 1-3).

A Site Survey Work Plan (Work Plan) was developed to detail the overall approach and sequence of events Jacobs intended to take to complete the PCB sample collection at Building 659. The Work Plan was divided into two volumes and includes a Work Plan Summary (WPS), Field Sampling Plan (FSP), Quality Assurance Project Plan (QAPP), and Health and Safety Plan (HSP) (Jacobs 1996a&b).

The project addressed by the Work Plan was first detailed in the USACE Scope of Work (SOW) for *Confirmation Sampling and Surveying for Closure of Building 659, PCB and Radiological Storage Areas, Tooele Army Depot, North Depot, Utah*, (USACE, 1995) dated 18 August 1995. In addition to the SOW, the *Final Tooele Army Depot - North Area, Record of Decision [ROD] for Operable Units 5, 6, 7, and 10*, (U.S. Army Environmental Center, 1994) provided the write-up for the Operable Unit (OU) including a Declaration and Decision Summary.

1.1 OBJECTIVES AND SCOPE

Ultimately, the objective is to decommission the PCB Storage Area (Solid Waste Management Unit [SWMU] 33/OU 5) and release that portion of Building 659 for nonrestricted use. The approved Work Plan presented the procedures required for PCB site characterization sampling for generating data necessary to verify whether or not residual PCB contamination exists within the PCB Storage Area, and whether detected levels of PCB contamination exceed established clean closure criteria. The PCB Storage Area site sampling and reporting must satisfy all appropriate regulatory agencies.

The SOW required:

- Developing the plans and procedures required for submittal to the USACE for performance of the project

- Mobilizing the appropriate personnel, materials, and equipment to TEAD
- Conducting the PCB site characterization sampling in the building
- Packaging and storing any waste, decontamination liquid, and waste personal protective equipment (PPE) generated during sampling activities
- Verifying and interpreting analytical laboratory results
- Providing a site characterization report to the USACE and TEAD upon project completion

1.2 REGULATORY REQUIREMENTS

TEAD is a National Priorities List (NPL) site, and SOW tasks followed Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and National Oil and Hazardous Substances Pollution Contingency Plan (NCP) guidelines. In addition, SOW efforts followed Toxic Substances Control Act (TSCA) and Resource Conservation and Recovery Act (RCRA) guidelines.

1.2.1 Agency Guidelines

As previously stated, TEAD would like to decommission the PCB Storage Area (SWMU 33/OU 5) and release that portion of Building 659 for nonrestricted use. The federal closure regulations and the State of Utah performance standards are presented below.

U.S. Environmental Protection Agency

PCB storage closure requirements are outlined in U.S. Environmental Protection Agency (EPA), PCB Regulations, 40 Code of Federal Regulations (CFR), Part 761. This policy establishes criteria EPA will use to evaluate the adequacy of cleanup of spills resulting from the release of materials containing PCBs at concentrations of 50 parts per million (ppm) or greater. This policy applies to spills which occurred after 4 May 1987. According to 40CFR761 Subpart, old spills which were discovered prior to 4 May 1987 require a site-by-site evaluation. Therefore, spills which occurred before 4 May 1987 are to be decontaminated to requirements established at the discretion of EPA. In this case, such requirements are established through EPA Region VIII.

According to the *TSCA Guidance Manual for Commercial PCB Storage Facility Applications*, Office of Toxic Substances, EPA, dated 18 October 1989, *all* sources of PCB contamination in

a facility are subject to Spill Clean-up Policy at closure, even if the contamination occurred before 4 May 1987.

State of Utah, Department of Environmental Quality

Closure must be certified in accordance with the requirements as outlined in the Utah Department of Environmental Quality (UDEQ) Hazardous Waste Management Rules (UDEQ 1996). In general, the state requirements follow the federal regulations.

1.2.2 Identify All Procedures And Regulations

The PCB Storage Area in Building 659 is a TSCA-regulated facility, as stated in the ROD. In the ROD process for SWMU 33/OU 5, the No Action alternative was selected as the most acceptable alternative. However, the ROD states that closure of the facility would be conducted under TSCA regulations and would satisfy Base Realignment and Closure (BRAC) requirements. Additionally, it is stipulated that closure will meet CERCLA requirements and satisfy RCRA Corrective Action obligations in the TEAD Federal Facilities Agreement (FFA) (EPA, et.al., 1991). The proposed PCB sampling scheme was developed using the guidance presented in *Verification of PCB Spill Cleanup by Sampling and Analysis* (EPA, 1985) and *Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup* (EPA, 1986).

1.2.3 Define The Release Criteria

The Requirements for Spill Cleanup (40CFR761.125) fully describes the numerical target decontamination concentration levels for restricted and nonrestricted access areas (refer to Table 1-1). Based on 40CFR761.125, the target decontamination concentration level for the Building 659 PCB Storage Area (a non-restricted use, residential/commercial, high contact area with non-impervious, indoor solid surfaces) is 10 micrograms/100 square centimeters (10 $\mu\text{g}/100 \text{ cm}^2$) as measured by the standard wipe test.

1.3 SITE DESCRIPTION AND OPERATING HISTORY

The PCB Storage Area in Building 659 (SWMU 33/OU 5) is a TSCA-regulated facility, as stated in the ROD. The facility has a concrete floor (180 feet by 250 feet), concrete perimeter berm (8

B

inches high), and diversion structures at each entrance for the containment of oil spills. The waterproof sealant used to seal all expansion joints and any hairline cracks is an Eternaflex Brand two-component urethane sealant, or equivalent (Plate FE-2556: Renovate Bldg #659 for PCB Storage [12/13/79]). The walls within the building are constructed of wood.

The facility began operating in 1979 and was used to store thousands of transformers that were once stored in open storage sites. The transformers were stored within the building on open pallets and in wooden crates. During the operation of Building 659, established procedures were followed to permit the safe storage and handling of items containing PCBs. In addition, procedures were in place to ensure containment, cleanup, and proper disposal of any spills occurring within the storage area. Soil and dust are collected during periodic sweep downs of the building and are properly drummed and disposed.

Record searches indicate that PCB spills occurred at SWMU 33/OU 5. Records of EPA inspections confirm that the oil spilled contained less than 50 ppm PCBs. Available records and surveys are attached as Attachment 1 of this report. The potentially contaminated materials were drummed, appropriately marked, and stored for disposal (EA, 1988). PCB disposal is managed by the Defense Reutilization and Marketing Office (DRMO) and conducted by U.S. Pollution Control, Inc. There is no evidence that any uncontrolled release to environmental pathways occurred as a result of the operations of this facility.

1.4 REPORT ORGANIZATION

Section 2.0 provides the site characterization sampling rationale and approach and selected field equipment and field procedures (including quality assurance/quality control [QA/QC]). Section 3.0 presents the laboratory results for concrete floor samples and wood/masonry wall samples, and comparison of findings with release criteria. Section 4.0 presents the data quality assessment and summary and conclusions. Section 5.0 lists the project references.

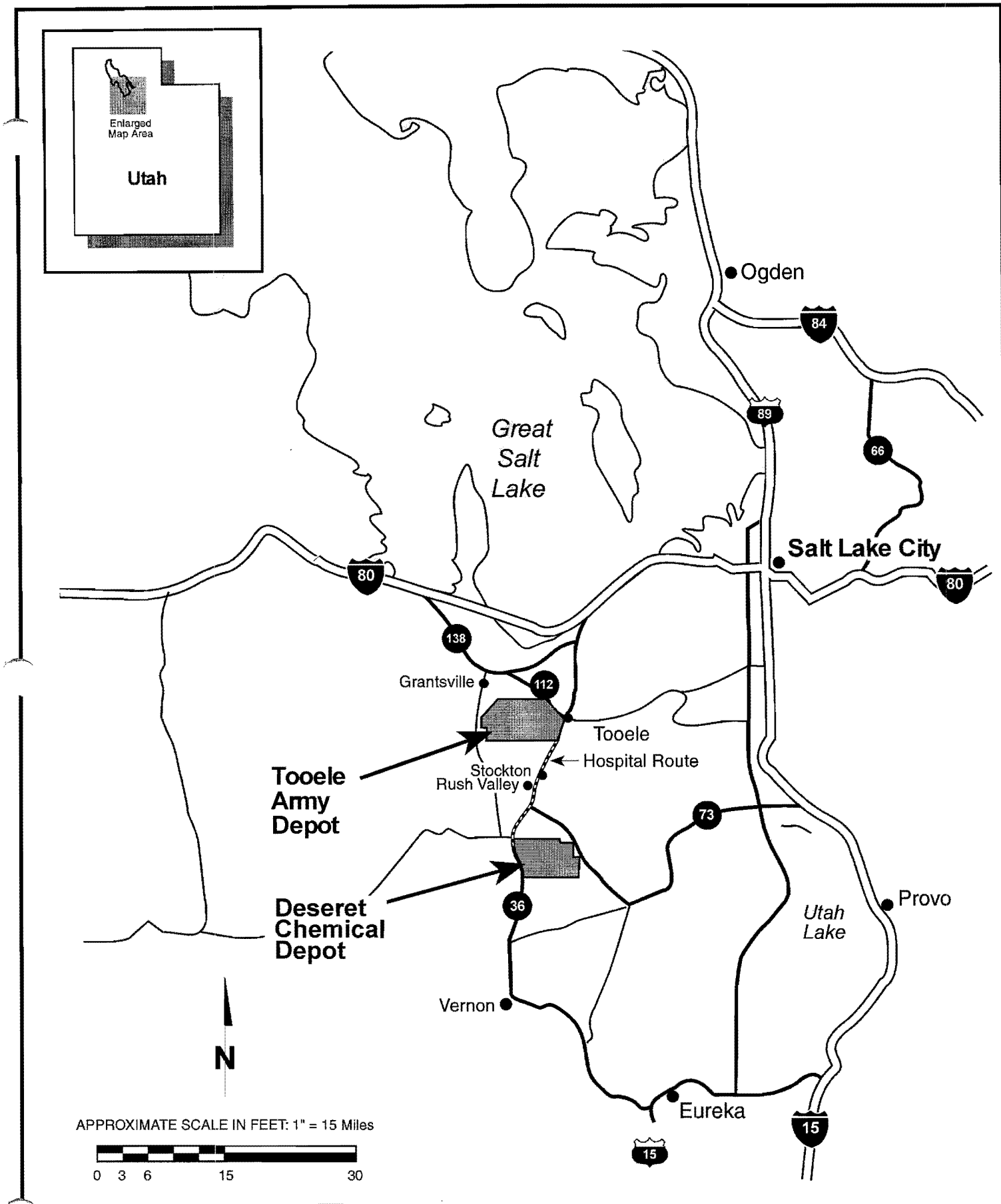
Table 1-1
Requirements For PCB Spill Cleanup (40CFR761.125) *

	Solid Surfaces									Soil	Comments
	Industrial	Residential/ Commercial	High Contact	Low Contact	Impervious	Non- Impervious	Outdoor	Indoor	Target decontamination concentration level**	Target decontamination concentration level	
Restricted use solid surfaces											
electrical substations	-	-	-	-	X	X	X	-	100 µg/100 cm ²	-	-
other surfaces	-	-	X	-	-	-	-	-	10 µg/100 cm ²	-	-
other surfaces	-	-	-	X	X	-	-	X	10 µg/100 cm ²	-	-
other surfaces	-	-	-	X	-	X	-	X	10 µg/100 cm ²	-	-
other surfaces	-	-	-	X	-	X	-	X	100 µg/100 cm ²	-	w/ encapsulation
other surfaces	-	-	-	X	X	X	X	-	100 µg/100 cm ²	-	-
Restricted use soil											
electrical substations	-	-	-	-	-	-	X	-	-	25-50 ppm***	option: negotiate
soil	-	-	-	-	-	-	-	-	-	25 ppm	-
Nonrestricted use solid surfaces											
other surfaces	-	X	X	-	-	-	X	X	10 µg/100 cm ²	-	-
other surfaces	-	-	-	X	X	-	X	X	10 µg/100 cm ²	-	including vault areas
other surfaces	-	-	-	X	-	X	X	-	10 µg/100 cm ²	-	-
other surfaces	-	-	-	X	-	X	X	-	100 µg/100 cm ²	-	w/ encapsulation
Nonrestricted use soil											
soil	-	-	-	-	-	-	-	-	-	10 ppm	w/ 10-inch soil cover
soil	-	-	-	-	-	-	-	-	-	1 ppm	no cover

* PCBs at concentration > 50 ppm

** As determined by standard wipe test

*** PPM is equivalent to mg/kg



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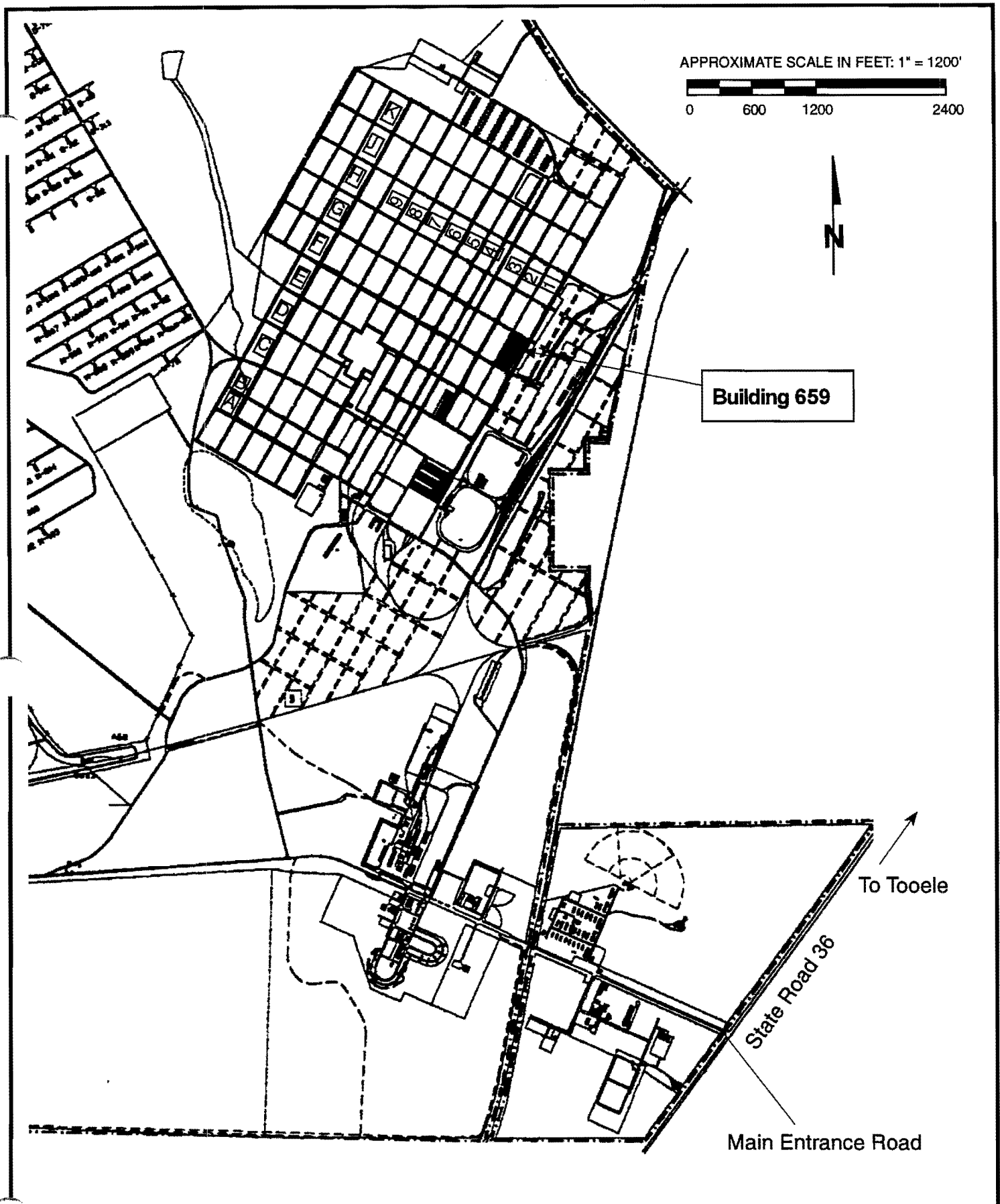
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SITE LOCATION MAP

**TOOELE ARMY DEPOT
TOOELE, UTAH**

FIGURE

1-1



JE JACOBS
ENGINEERING

BUILDING 659 LOCATION MAP

FIGURE

TOOELE ARMY DEPOT
TOOELE, UTAH

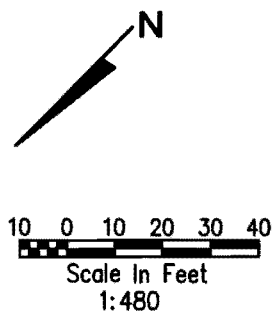
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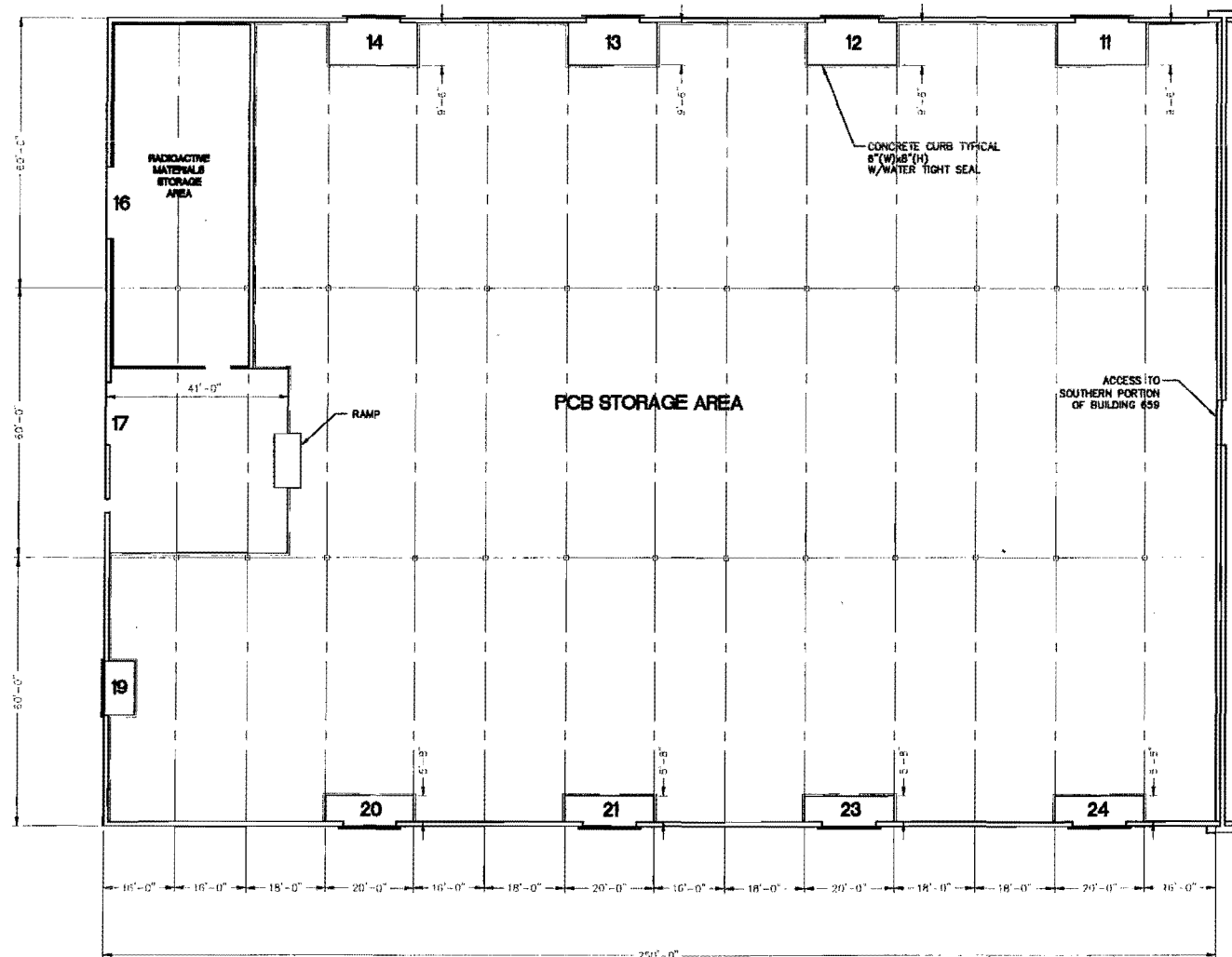
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LEGEND

14 Rollup Door Designation



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Date: 8/15/96

BUILDING 659 - PCB STORAGE AREA
(NORTHERN HALF OF BUILDING 659)

TOOELE ARMY DEPOT
TOOELE, UTAH

FIGURE

1-3

2. SITE CHARACTERIZATION

A site visit and historical records review was conducted by Jacobs the week of 9 October 1995. Although visible oil staining was observed at numerous floor locations within SWMU 33, there was no visible evidence that any uncontrolled release to environmental pathways had occurred as a result of the operations of this facility. According to review of available PCB spill records only small PCB spills which were quickly controlled occurred within the storage area. Cleanups were quickly performed and recorded in existing records. Copies of the available PCB records and surveys are included as Attachment 1 of this Site Characterization Report. Jacobs conducted the site characterization field activities from 3 to 14 June 1996.

2.1 SITE CHARACTERIZATION FIELD ACTIVITIES

Following are brief descriptions of each task performed by Jacobs during the project.

2.1.1 Project Plans/Procedures

During the initial phase of the project, Jacobs developed a Draft Work Plan to perform the assigned SOW tasks. Government review comments were incorporated into the Final Work Plan prior to initiating field activities (Jacobs 1996a&b). The Final Work Plan was submitted to USACE for distribution to EPA and UDEQ.

2.1.2 Mobilization

Once procedures and plans were finalized and approved, Jacobs mobilized the project team on site.

2.1.3 PCB Sample Collection

This section briefly summarizes the methods for PCB sample collection.

Grid Samples

Building 659 was divided into grids to identify sample locations. The proposed PCB sampling scheme was developed using the guidance presented in *Verification of PCB Spill Cleanup by*

Sampling and Analysis (EPA, 1985) and *Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup* (EPA, 1986).

Authoritative Samples

Based on the original site visit and historical records, authoritative (judgmental) sample locations were identified. At the time of this first visit not all floor areas were available for inspection. Prior to mobilization TEAD personnel removed the remaining transformers and drums on pallets. During mobilization for field activities Jacobs reinspected the PCB Storage Area for floor stains. A few authoritative samples were relocated to facilitate the site characterization. Grid and authoritative samples were composited per the requirements of the EPA guidance documents referenced above.

PCB Concrete Core and Wood Chip Sample Collection

Based on grid and authoritative sampling protocols, PCB concrete core samples were collected from the floors of the PCB Storage Area from areas with and without visible staining. PCB wood chip samples were collected from areas on the walls with and without visible staining. Appropriate QA core and chip samples were also collected.

Photographs

During sample collection, photographs were taken to support the sampling activities (Figures 2-1 through 2-4). When a photograph was taken, the date, time, subject, number of photograph, and the name of the person taking the photograph were recorded the field logbook. All photographs are part of the project file.

2.1.4 Repair

The holes created by the concrete core and wood chip sampling in the storage areas were patched and repaired.

2.1.5 Decontamination

All sampling equipment was decontaminated before each sample collection. All survey equipment was decontaminated after each use.

2.1.6 Demobilization

Once surveying and sampling were completed, Jacobs demobilized the on-site team.

2.1.7 Waste Handling/Disposal

Wastes generated during field activities were handled in accordance with the TEAD Investigation Derived Waste Plan, "Industrial Risk Management Policy Statement #94-EP-02."

2.2 SAMPLING RATIONAL AND APPROACH

The following discussion includes a description of the sampling scheme, location, and frequency of samples collected from SWMU 33.

2.2.1 Sampling Location and Frequency

The proposed PCB sampling and compositing scheme was developed using the guidance presented in *Verification of PCB Spill Cleanup by Sampling and Analysis* (EPA, 1985) and *Field manual for Grid Sampling of PCB Spill Sites to Verify Cleanup* (EPA, 1986). The PCB sample point locations were based upon a hexagonal grid sample design (EPA, 1995). This design allowed for the collection of representative samples of the site and greatly increased the chance of detecting any high levels of PCB contamination, if present. The hexagonal grid sampling design was centered on the PCB storage area (Figure 2-5).

In addition, based on the site visit and historical records search, authoritative (judgmental) sample locations were identified. Grid and authoritative samples were composited per the guidance documents referenced above.

The goal of the analysis effort is to determine whether at least one sample has a PCB concentration above the allowable limit. This may be determined by a strategy involving analysis of composite samples. The number of discrete samples that may be composited is determined on the basis of the established action level and the laboratory detection limit. For this project, the detection limit for PCBs in the concrete matrix was 0.05 mg/kg and the number of concrete floor samples to be composited was taken as ten, as shown in Table 2-1. If no PCBs are detected in a given composite sample, then the maximum possible value for any discrete component of the composite may be assumed to be $10 \times 0.05 = 0.5$ mg/kg, a value well below the applicable action levels summarized in Table 1-1.

Table 2-1 presents a summary of floor, wall, and QA/QC samples that were collected during the site characterization field activities.

Table 2-1
PCB Compositing and Discrete Sampling Schema

Group	#SXs/ Composite	Matrix	Number of Analyses						Total
			CS	Discrete	FD	MS/MD	QA	ER	
A	5	Wood wall	1	1	0	2	1	1	6
B	4	Wood wall	1	0	0	0	0	0	1
C	4	Wood wall	1	2	1	2	1	1	8
D	3	Brick wall	1	0	0	2	1	1	5
E	10	Concrete	1	2	1	2	1	1	8
F	10	Concrete	1	2	1	0	1	1	6
G	10	Concrete	1	2	1	2	1	0	7
	46 samples collected	TOTALS	7	9	4	10	6	5	41
Waste Characterization									1
									42 samples analyzed
#SXs = number of samples CS = composite FD = field duplicate MS/MD = matrix spike/ spike duplicate QA = SPD Lab split sample ER = equipment rinsate									

2.2.2 Concrete Core and Masonry and Wood Chip Samples

To evaluate the potential for achieving clean closure based on the approved clean closure criteria, samples were collected and analyzed for PCBs from floor and wall locations following



PHOTO 1. Typical Concrete Core Sample Being Cut.



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Date: 8/19/96

PHOTO NO. 1

TOOELE ARMY DEPOT
TOOELE, UTAH

FIGURE

2-1

25



PHOTO 2. Typical Concrete Core Sample Being Restored.

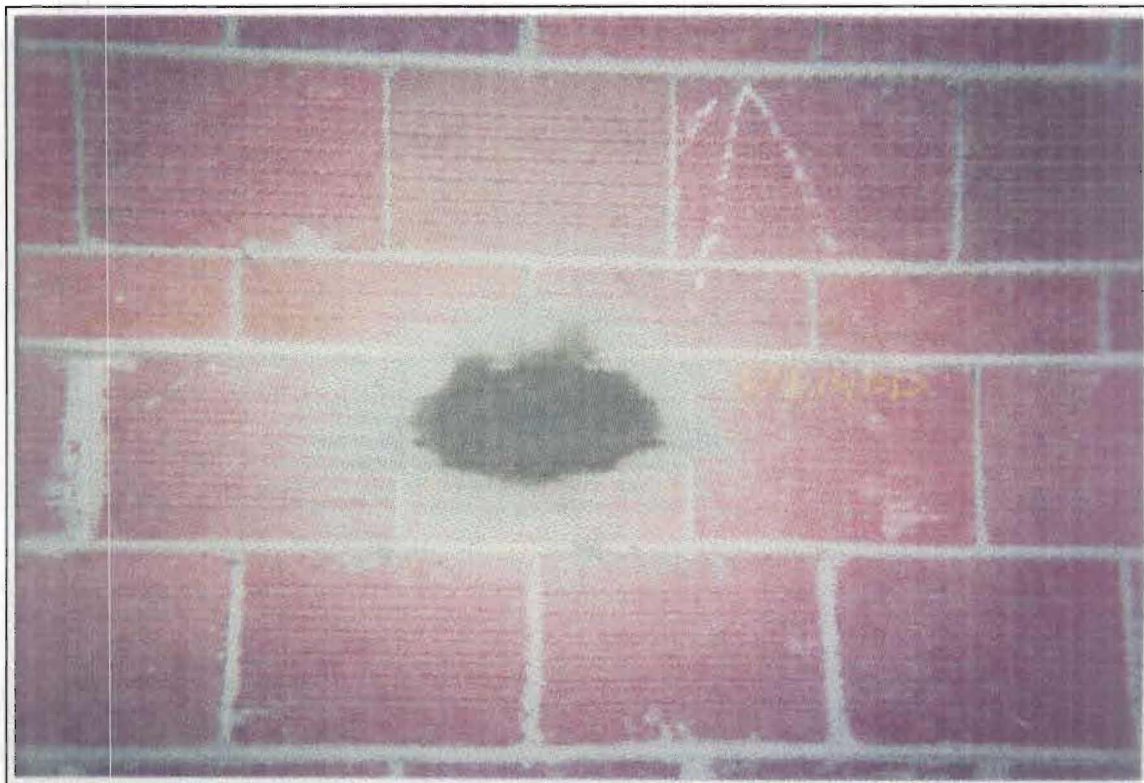


PHOTO 3. Completed Restoration of Fire Wall



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PHOTO NO. 2 and 3

TOOELE ARMY DEPOT
TOOELE, UTAH

FIGURE

2-2

File: g:\cadd\27h10319\photos\photo2.fh3

Date: 8/19/96

Drawn by: sjr Project No. 27H10319

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PHOTO 4. Wood Chip Sampling

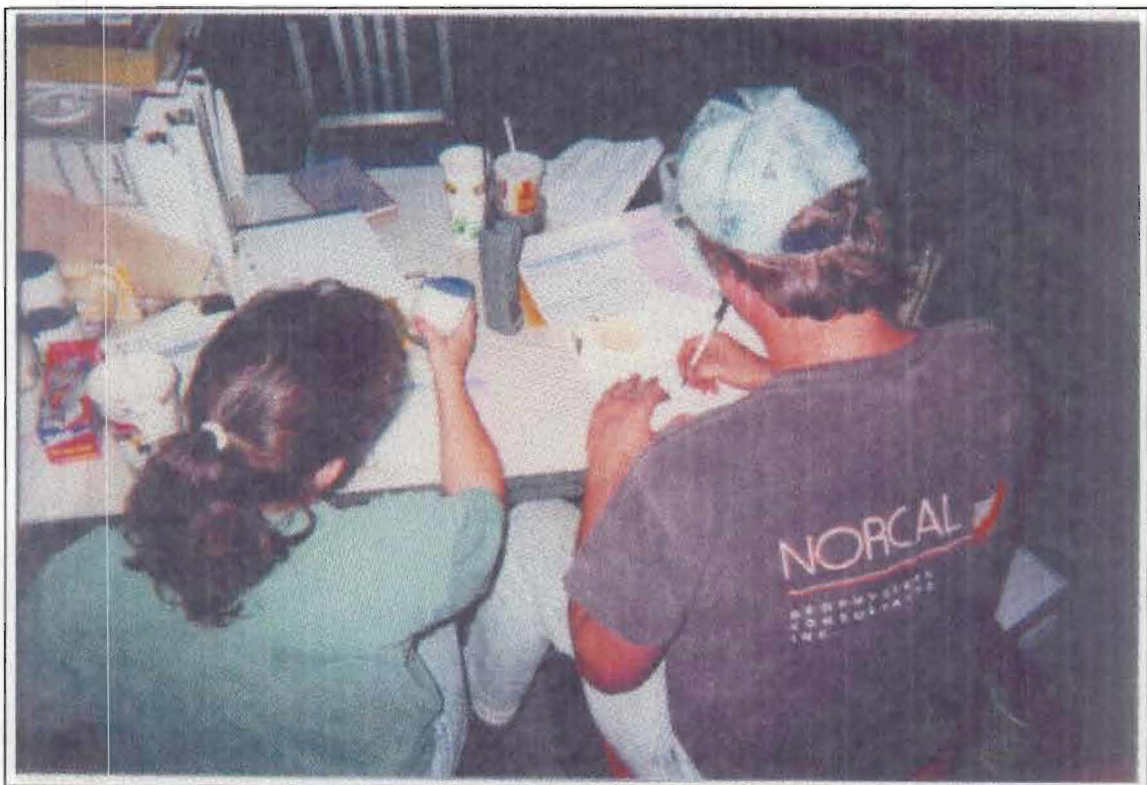


PHOTO 5. Final Check and Packaging for Shipment to Laboratories



JACOBS
ENGINEERING

PHOTO NO. 4 and 5

TOOELE ARMY DEPOT
TOOELE, UTAH

FIGURE

2-3

File: g:\cadd\27h10319\photos\photo3.fh3

Date: 8/19/96

Drawn by: sjr Project No. 27H10319

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PHOTO 6. Final Containment of Project-Generated PCB Area Waste and Decontaminated Water.



JACOBS
ENGINEERING

File: g:\cadd\27h10319\photos\photo4.fh3
Drawn by: sjr Project No. 27H10319

Date: 8/19/96

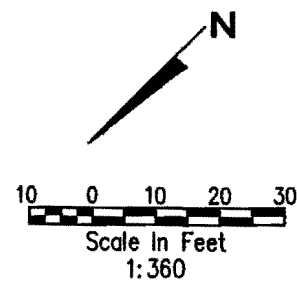
PHOTO NO. 6

TOOELE ARMY DEPOT
TOOELE, UTAH







FIGURE

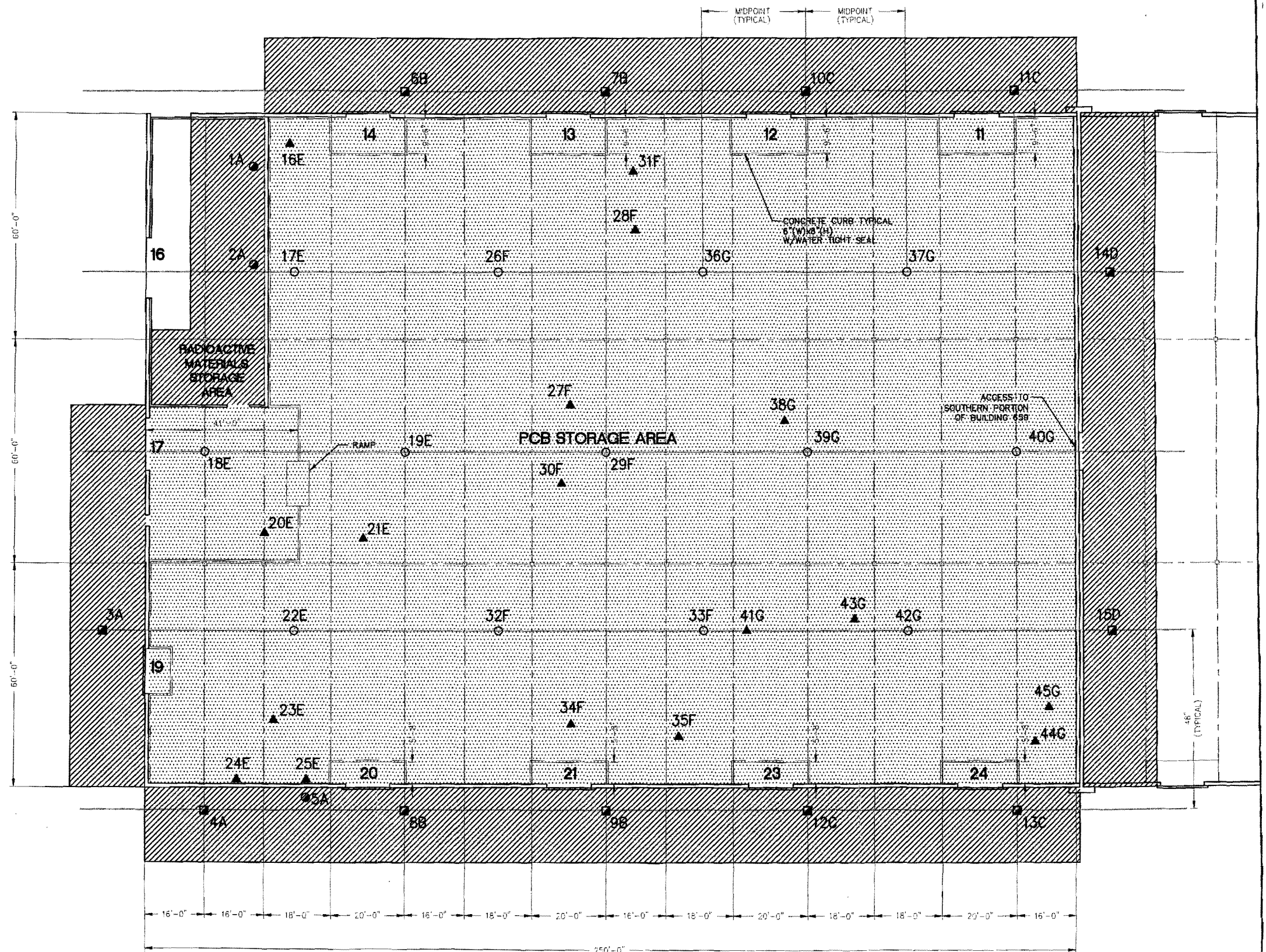
2-4

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LEGEND

-  PCB Storage Area Floor Designation
-  PCB Storage Area Wall Designation
- 14** Rollup Door Designation
-  PCB Core Sample; Floor Location; Authoritative
-  PCB Chip Sample; Wall Location; Authoritative
-  PCB Core Sample; Floor Location; Grid
-  PCB Chip sample; Wall Location; Grid
- 23E Sample Number and Composite Sample Group



JE JACOBS ENGINEERING

File: ...\\27h10319\\pcb96_08\\pcbsl.dwg
 Drawn by: LA Project No. 27H10319

Date: 8/13/96

BUILDING 659 - PCB STORAGE AREA
 PCB SAMPLING LOCATIONS

TOOELE ARMY DEPOT
 TOOELE, UTAH

FIGURE

2-5

EPA guidance. Floor samples were collected by utilizing a concrete corer to remove a concrete core approximately one quarter-inch thick. Wall samples were collected both by using a chisel to remove wood chip samples approximately one quarter-inch thick and by using wipe sampling.

A total of 46 concrete core, masonry and wood chip samples were collected during the site characterization activities. Seven sample groups were composited for analytical testing by EPA Method 8080. Thirty concrete core floor samples were composited from three groups of 10 samples each. Thirteen wood chip wall samples were composited from three groups of five, four, and four samples. Three masonry chip wall samples were composited from one group of three samples. Individual samples were reserved for follow-up analysis in the event that composite sample analysis was not conclusive; therefore, seven discrete samples were required to properly evaluate potential facility contamination. In addition, four field duplicate, 10 matrix spike/matrix spike duplicate, six South Pacific Division Laboratory (SPDL) split, and five equipment rinsate samples were collected and analyzed by EPA Method 8080. Figure 2-5 presents the sample locations.

2.2.3 Wipe Samples

No impervious floors or walls were identified in the PCB Storage Area. Therefore, PCB wipe samples were not collected for analytical laboratory testing by EPA Method 8080.

2.3 SAMPLING TYPES

This section describes the types of samples collected for the site characterization activities.

2.3.1 Trip Blanks

Trip blanks are composed of purged deionized (DI) water added to a clean preserved volatile organic analyte (VOA) vial to detect potential cross contamination of VOCs during sample shipment. No samples were analyzed for VOCs during the investigation of SWMU 33; therefore, trip blanks were not used.

2.3.2 Quality Control (QC) Samples

QC samples are blind, collocated field duplicates submitted to the Contract Laboratory for the purpose of assessing field sampling precision. QC samples were collected as 10 percent of the total sampling effort. Generally, QC splits were collected for the first sample and every tenth sample thereafter. QC split samples were analyzed for the same parameters as the corresponding primary sample.

2.3.3 External Quality Assurance (QA) Samples

QA samples are field splits that are submitted to the QA laboratory, SPDL. QA samples were collected at a frequency of 10 percent for each matrix. Jacobs was responsible for the collection, labeling, packing, and shipping of QA samples to SPDL.

2.3.4 Rinsate Samples

One rinsate sample was collected for each day of solid material sampling and for each crew performing sampling during field operations.

2.3.5 Field Blanks

One field blank was obtained for each lot (5-gallon container, lot number, etc.) of water that is used for rinsing.

2.4 FIELD DOCUMENTATION

Field activities were documented in a field logbook. A copy of the field log can be found in the Weekly Field and Laboratory Quality Control Report. (Refer to Attachment 2, Jacobs, 1996c). Following is a summary of the field documentation used during the work.

2.4.1 Sample Information Documentation

All information pertinent to the environmental samples, including specific collection data, names of sampling personnel, and laboratory observations were recorded in permanently bound notebooks. Sample identifications (IDs) were linked to the site where the sample originated.

For example, the fourth concrete core sample taken on the floor of the storage area would be designated as TEAD-659N-FL-04-C-PCB. CKY Laboratories, Inc. (CKY), the contract laboratory for this project, also employed a specific information management system to assist in tracking the progress of each sample through the analytical process.

2.4.2 Preparation of Field Logbooks

The field logbooks were bound with sequentially numbered pages and assigned to the sampler who was responsible for entry of information into that particular logbook. The field logbook was signed and dated by this person prior to initiation of field work. All entries into the field logbook were executed by this designated person. If it was necessary to transfer the field logbook to alternate personnel during the course of the work, the person relinquishing the field logbook signed and dated the field logbook at the time the field logbook was transferred. The person receiving the field logbook did the same to acknowledge transfer of field logbook custody.

Corrections to erroneous data were made by crossing a line through the entry and entering the correct information. Each correction was initialed and dated by the person making that correction. Unused portions of the field logbook pages were crossed out, signed, and dated at the end of each work day. All field logbook entries were legible, in ink, and contained accurate documentation. Language used was objective, factual, and free of personal opinions. Field logs became part of the project records and were delivered to the USACE Technical Manager (TM) at the end of the project (Jacobs 1996c)

2.5 SAMPLING AND EQUIPMENT PROCEDURES

All sampling activities were performed to protocols, specific to each parameter of interest, promulgated by the EPA, and by USACE as described in Appendix F of ER-1110-1-263, Sample Handling Protocol for Low, Medium, and High Concentration Samples and Hazardous Waste. Where such protocols have not been established by the EPA or the USACE, protocols established by some other recognized authority (e.g., American Society for Testing and Materials [ASTM], U.S. Nuclear Regulatory Commission [NRC], and TSCA) were used.

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2.5.1 PCB Concrete Core, Masonry and Wood Chip Sample Collection Procedures

This section describes the procedures used to collect samples at SWMU 33.

Perform Building Inspection

Upon arriving at the PCB Storage Area, the sampling team evaluated site conditions to identify visible staining on floor and wall surfaces. The sampling team confirmed that the building was empty and currently not being used to store any types of transformers or petroleum products.

Delineate Sampling Grid

Upon completion of the site inspection, the PCB Storage Area floors and wall areas were divided into grids to identify sampling locations (both grid and authoritative).

Collect Concrete Core Samples

Using a concrete corer that had undergone the four-step decontamination process outlined below in Section 2.5.2, the concrete was cored to approximately one quarter-inch deep. Using a decontaminated stainless steel crowbar, the core sample was removed and placed into the proper glass container. The container was double bagged and placed into the sample cooler with ice to ensure a temperature of 4 degrees centigrade (°C). At that time all sample information was completed on the sample label, chain-of-custody (COC) form, and in the project field logbook.

Collect Masonry and Wood Chip Samples

Using a stainless steel chisel that had undergone the four-step decontamination process outlined below in Section 2.5.2, a piece of masonry or wood was chipped approximately one quarter inch-deep. The masonry or wood chip sample was placed into the proper glass container. The container was double bagged and placed into the sample cooler with ice to ensure a temperature of 4°C. At that time, all sample information was completed on the sample label, COC form and in the project field logbook.

2.5.2 Equipment Decontamination Procedures

In accordance with EPA Method SW-846 (EPA, 1992), the following procedure was followed for decontamination of stainless steel tongs, bowls, spoons, corer drill bits, and crowbars used to collect samples for PCB analysis:

- Detergent Wash: using a liquinox solution, the sampling equipment was scrubbed using a long-handled bristle brush.
- Tap Water Rinse: the sampling equipment was thoroughly rinsed with potable water.
- Methanol Rinse: the sampling equipment was thoroughly rinsed with a pesticide-grade methanol rinse. Residual methanol was collected in a container separate from decontamination water.
- Final Rinse: the final rinse was conducted using ASTM Type II Reagent Grade DI Water.

2.6 SAMPLE HANDLING PROCEDURES

This section discusses the procedures used after sample collection.

2.6.1 Sample Containers, Preservation, and Holding Time

Sample containers were provided by CKY. Containers arrived with a certification of purity that was maintained in project records. All samples submitted for analysis were labeled appropriately with location, time and date of sampling; whether discrete or composite; analysis to be performed; and sampler's signature.

The following is a summary of container preservation, and holding time requirements for each parameter.

Parameter	Container	Preservative	Holding Time (extraction)	Holding Time (extr. to analysis)
PCBs	8-oz. glass (solid/wipe) 1-L Amber Glass (liquid)*	Cool to 4°C Cool to 4°C	14 days 7 days	40 days 40 days

* for decontamination rinsate samples

2.6.2 Sample Transportation

Samples were shipped to CKY and SPDL via overnight courier. Samples were packaged and shipped in accordance with EPA, USACE, and U.S. Department of Transportation (DOT) regulations. The following procedure was followed for sample packing:

- **Inspect and Tape Cooler:** an inspection was performed of the shipping cooler to ensure that it was structurally sound for sample shipment. Duct tape was used to tape the drain spout shut to prevent any liquid from escaping during shipment.
- **Line Cooler:** bubble-wrap was used as a packing material. The bottom of the cooler was lined to prevent potential sample damage during shipment. A double liner of plastic bags inside the cooler was used to prevent any possible escape of liquid during shipment.
- **Wrap Samples:** each sample container was individually double bagged using a zip-lock style bag. Each sample container was wrapped in bubble wrap to prevent breakage.
- **Bag Ice:** ice was double-bagged using zip-lock style bags to prevent leakage.
- **Pack Cooler:** sample containers were alternated with layers of double-bagged ice to ensure that the temperature of the samples remains at 4°C during shipment. The plastic bags were closed and a signed custody seal placed around the bags. The COC form was placed in a sealed zip-lock style bag and taped to the inside of the cooler lid. The cooler was sealed using tape on both sides. Signed custody seals were placed on the front and sides of the cooler. "Fragile" and "This Side Up" stickers were placed on the cooler. The air bill was affixed to the top of the cooler.

2.6.3 Chain-of-Custody Procedures

Samples were collected, transported, and received under strict COC protocols consistent with procedures established by the EPA. Upon receiving the sample shipment, CKY recorded the temperature of the air inside the cooler and of the temperature blank. The results were recorded on the cooler receipt form. Copies of completed COC forms were provided to the USACE TM upon completion of sampling activities (Jacobs 1996c). Cooler receipt forms were used to document the conditions upon receipt by CKY. The results of all checks for preservation of samples were recorded on the cooler receipt form.

2.7 INVESTIGATION-DERIVED WASTE

This section outlines the procedures used for proper collection, containerization, characterization, transport, and disposal of investigation-derived waste (IDW) at Building 659 at TEAD. IDW is defined here as "waste generated during the course of the environmental investigation that had the potential for being hazardous and thus required special handling."

Wastes generated during field activities were handled in accordance with TEAD's Industrial Risk Management Policy Statement #94-EP-02 (TEAD 1993).

2.7.1 Concrete Core, Masonry, and Wood Chips/Dust

Wastes in the form of unused samples and concrete cores and masonry/wood chips/dust were generated during sampling. Contaminant concentrations were determined by analytical laboratory results. This waste was containerized per Section 2.6.4.

2.7.2 Decontamination Rinsate

Liquid wastewater generated during decontamination of PCB field equipment was collected and containerized in a single drum. Attempts were made to minimize the amount of liquid used in the decontamination. Fluids from decontamination of personnel and sampling equipment were placed in appropriate 5-gallon, DOT-approved drums. If residual PCB concentrations in rinsate solution was 2.0 ppm or more, the solutions would be disposed at an appropriately regulated facility.

2.7.3 Disposable PPE

PPE classified as waste included disposable suits, gloves, boots, and plastic sheeting. The daily amount of PPE waste generated was minimal, and the total waste generated for this phase fit into one 5-gallon drum. The drum was closed at the end of each work day and sealed upon completion of the sampling task. The drum was placed in a staging area within the Building 659 PCB Storage Area and appropriately labeled.

2.7.4 Liquid Waste Containers

Liquid wastes were containerized in DOT-approved, steel, closed-head, 5-gallon drums with standard bungs. Before use, each drum was inspected for physical integrity.

2.7.5 Labeling of Containers

A drum label was immediately attached to any drum containing waste material. The drum was stored on end with the label placed on the side of the drum in the upper third section (not on the

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drum head). The label was filled out using waterproof ink. Waste material labels were used before receiving the results of the analytical samples used to characterize the drums contents. If analytical results characterized the drums contents as hazardous, the waste material label was replaced by a hazardous waste label.

2.7.6 On-Site Container Storage

Drums were stored in an on-site area designated by TEAD Environmental Management for waste storage. The waste storage area was located where containers were safe from vehicular traffic.

2.7.7 Waste Characterization

A liquid waste sample was collected from the decontamination water during the site investigation and used to characterize the containerized waste.

2.7.8 Waste Handling and Disposal

TEAD was the waste generator for this work. Liquid waste was turned over to Defense Reutilization and Marketing (DRMO) for proper disposal. Solid wastes characterized as noncontaminated were disposed on site in approved dumpsters.

2.7.9 IDW Reporting

Per TEAD's Industrial Risk Management Policy Statement #EMD-01, Jacobs turned in liquid waste (< 5 gallons) to DRMO. The liquid waste sample was documented with PCB concentrations less than the reporting limit (3 µg/L). The analytical report and COC are found in Attachment 3.

2.8 QUALITY CONTROL FOR FIELD OPERATIONS

Jacobs implemented a USACE three-phase control system during field operations. This system is described in detail in the QAPP (Jacobs 1996a). In general, the three-phase control involves a preparatory phase prior to initiating any field work, an initial phase at the start of field

work, and a follow-up phase through completion of the field work. All field activities complied with the three-phase control procedures.

Meeting minutes taken during the preparatory phase, initial phase, and a follow up phase meetings can be found in the Weekly Field and Laboratory QC Report. (Refer to Attachment 2, Jacobs 1996c).

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3. SITE CHARACTERIZATION RESULTS

3.1 ANALYTICAL LABORATORY RESULTS

The contract laboratory for this field effort was CKY Laboratories, Inc., now called EMAX, in Torrance, CA. The quality assurance laboratory was South Pacific Division Laboratory (SPDL), Sausalito, CA.

3.1.1 Compositing Scheme

Samples collected from concrete flooring and wood and masonry walls were composited into seven groups, A through G, and analyzed for PCBs by EPA SW846 method 8080. The compositing and discrete sampling schema is shown in Table 2-1.

Collocated field duplicates were generally selected from stained floor or wall areas and analyzed as discrete samples. These field duplicates were split and the split portions sent to SPDL for analysis as QA samples.

A portion of each of the concrete core and wood chip samples that underwent compositing was reserved in the event that subsequent analysis might be required. In order to guard against missed extraction holding times, CKY was instructed to extract each of the 46 discrete samples and to hold the extract for possible further analysis.

The six QA splits were scheduled to be linked with six pairs of field duplicates. However insufficient sample prevented the analysis of one of the wood wall discretes; CKY neglected to analyze the discrete masonry field duplicate designated on the chain of custody. In the latter case, the Group D composite, consisting of only three samples, was found to be free of detectable PCB contamination; therefore, further analysis of Group D discretes was not requested. These deviations reduced the number of replicate sample comparisons to four pairs of collocated field duplicate results and five pairs of split sample results.

3.1.2 Qualitative Identifications

A number of detected results were reported by CKY and SPDL. The chromatograms were indicative of degraded PCB fractions. Due to the degraded condition of these materials, the qualitative identifications and quantitative results must be qualified as estimated values. CKY reported detections of Aroclors 1016, 1254 and 1260, while SPDL laboratory reported Aroclors 1242, 1254 and 1260 in various samples. The results are summarized in Table 3-1.

3.1.3 Analytical Results: Concrete Floor

The highest levels of PCBs were found in the concrete floor samples of composite groups E, F and G. Although Aroclor 1260 was the most frequently detected PCB, the highest single result (6.3 mg/kg) was a detection of Aroclor 1254 in the QA split from composite group E. Aroclor 1260 was found at a level of 2.59 mg/kg in a discrete sample in composite group F. The highest result for a composite sample was 0.36 mg/kg for Aroclor 1254 from group E.

3.1.4 Analytical Results: Masonry/Wood Walls

No PCBs were detected in composite groups A (wood wall), B (wood wall) or D (masonry wall) or in the associated discrete field duplicates or QA samples. Aroclor 1260 was the predominant PCB detected in discrete and composite samples from within Group C (wood wall). Total PCBs detected in samples taken from within Group C varied from 0.12 mg/kg in the field duplicate to 0.55 mg/kg in the QA split sample.

3.1.5 QA/QC

The results of the data quality assessment described in Section 4 are summarized here. CKY provided complete data packages for all analyses. These were reviewed in depth; the quality of laboratory analysis was found generally satisfactory. No holding times for extraction or analysis were missed. No contamination was found in the method blanks. A number of surrogate recoveries were below acceptance limits but all were greater than 10 percent. Four of 12 matrix spike/matrix spike duplicate recoveries from these nonstandard matrices were below acceptance limits established for soil samples. Reanalysis confirmed that these were due to matrix effects. All laboratory control sample recoveries were within limits.

A comparison of field duplicate and QA split sample results is provided in Table 3-1. Although the overall pattern of results for these discrete samples is consistent with that for composite analysis, the agreement between collocated pairs of field duplicates and between split samples collected from concrete flooring is erratic. Group E field duplicate results were nondetected while the QA split sample gave a result for Aroclor 1254 of 6.3 mg/kg. Group F split sample results (0.29, 0.42 mg/kg) were in agreement but the field duplicate results differed by nearly a factor of 10 (2.59, 0.29 mg/kg). These inconsistencies suggest that (1) split samples needed to be more completely homogenized in the field; and (2) PCB contamination is unevenly distributed in small pockets within the concrete matrix.

3.2 COMPARISON OF FINDINGS WITH RELEASE CRITERIA

The requirements for PCB spill cleanup are summarized in Table 1-1. As presented in the approved Final Work Plan (Jacobs 1996a), the clean closure criterion proposed for the PCB Storage Area is 25 mg/kg. Reference to Table 1-1 indicates that this value corresponds to the EPA criterion established for soil, a non-impervious medium, in areas of restricted use. The results of the analysis of wood, masonry and concrete core samples summarized in Table 3-1 show that the 25 mg/kg criterion was not exceeded. In addition, the results show that the 10 mg/kg criterion was not exceeded for a non-impervious medium, in areas of nonrestricted use. The highest concentrations of total PCBs in discrete samples were 7.1 mg/kg (sample ID FP-CC-25DD) from Area E and 2.59 mg/kg (sample ID FP-CC-29D) from area F. No other results for either composite or discrete samples exceeded 0.55 mg/kg.

**Table 3-1
Summary of Results of PCB Analysis**

Sample ID	QC Code	Matrix	Results (mg/kg)					
			1016	1242	1254	1260	Totals	RL
Composite Group A (5)	CS	WC	ND	ND	ND	ND	ND	0.054
WP-SR-01	N	WC	NA	NA	NA	NA	NA	N/A
WP-SR-02	N	WC						
WP-SR-03	N	WC						
WP-SR-04	N	WC						
WP-SR-05	N	WC						
WP-SR-01D	FD	WC	ND	ND	ND	ND	ND	0.054
WP-SR-01 DD	QA	WC	ND	ND	ND	ND	ND	0.017
Composite Group B (4)	CS	WC	ND	ND	ND	ND	ND	0.053
WP-SR-06	N	WC						
WP-SR-07	N	WC						
WP-SR-08	N	WC						
WP-SR-09	N	WC						
Composite Group C (4)	CS	WC	0.17	ND	ND	0.16	0.33	0.054
WP-SR-10	N	WC	ND	ND	ND	0.23	0.23	0.050
WP-SR-11	N	WC						
WP-SR-12	N	WC						
WP-SR-13	N	WC						
WP-SR-10D	FD	WC	ND	ND	ND	0.12	0.12	0.054
WP-SR-10 DD	QA	WC	ND	0.13	0.10	0.32	0.55	0.017
Composite Group D (3)	CS	BC	ND	ND	ND	ND	ND	0.050
WP-BC-14	N	BC	NA	NA	NA	NA	NA	N/A
WP-BC-15	N	BC						
WP-BC-14D	FD	BC	NA	NA	NA	NA	NA	N/A
WP-BC-14DD	QA	BC	ND	ND	ND	ND	ND	0.016
Composite Group E (10)	CS	CC	ND	ND	0.36	ND	0.36	0.051
FP-CC-16	N	CC						
FP-CC-17	N	CC						
FP-CC-18	N	CC						
FP-CC-19	N	CC						
FP-CC-20	N	CC						
FP-CC-21	N	CC						
FP-CC-22	N	CC						
FP-CC-23	N	CC						
FP-CC-24	N	CC						
FP-CC-25	N	CC	ND	ND	ND	ND	ND	0.050
FP-CC-25D	FD	CC	ND	ND	ND	ND	ND	0.051
FP-CC-25DD	QA	CC	ND	ND	6.3	0.84	7.14	0.82

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Table 3-1 (Continued)
Summary of Results of PCB Analysis

Sample ID	QC Code	Matrix	1016	Results (mg/kg)				
				1242	1254	1260	Totals	RL
Composite Group F (10)	CS	CC	ND	ND	ND	0.25	0.25	0.051
FP-CC-26	N	CC						
FP-CC-27	N	CC						
FP-CC-28	N	CC						
FP-CC-29	N	CC	ND	ND	ND	2.59	2.59	0.050
FP-CC-30	N	CC						
FP-CC-31	N	CC						
FP-CC-32	N	CC						
FP-CC-33	N	CC						
FP-CC-34	N	CC						
FP-CC-35	N	CC						
FP-CC-29D	FD	CC	ND	ND	ND	0.29	0.29	0.051
FP-CC-29DD	QA	CC	ND	0.11	0.16	0.15	0.42	0.016
Composite Group G (10)	CS	CC	ND	ND	ND	0.20	0.20	0.051
FP-CC-36	N	CC						
FP-CC-37	N	CC						
FP-CC-38	N	CC						
FP-CC-39	N	CC						
FP-CC-40	N	CC						
FP-CC-41	N	CC						
FP-CC-42	N	CC						
FP-CC-43	N	CC						
FP-CC-44	N	CC	ND	ND	ND	ND	ND	0.050
FP-CC-45	N	CC						
FP-CC-44D	FD	CC	ND	ND	ND	0.064	0.064	0.051
FP-CC-44DD	QA	CC	ND	0.11	0.054	0.057	0.221	0.016
<p>Key:</p> <div> <div>WP = wall</div> <div>FP = floor</div> <div>WC = wood chips</div> <div>BC = brick</div> <div>CC = concrete</div> <div>ND = not detected</div> <div>NA = not analyzed (insufficient sample)</div> <div>N/A = not applicable</div> <div>RL = reporting detection limit</div> </div> <div> <div>CS = composite</div> <div>N = normal sample</div> <div>FD = field duplicate</div> <div>QA = QA split sample</div> </div> <p>Integer in parentheses = number of discrete samples per composite Detected results are shaded 1016, 1242, 1254, 1260 = aroclor PCB designations (1221, 1232, 1248 were not detected in any sample)</p>								

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4. DATA QUALITY ASSESSMENT AND CONCLUSIONS

4.1 DATA QUALITY ASSESSMENT

Samples were collected from wall and floor locations and analyzed as composite and discrete samples as indicated in Table 2-1. Four pairs of field duplicates were analyzed. Field quality control samples included five equipment rinsates. Another six QA split samples (discretes) were submitted to SPDL, Sausalito, CA, for confirmatory analysis.

Laboratory analytical data received from CKY, Torrance, CA, (now called EMAX) were subjected to a process of verification that included completeness checks and review and evaluation of field and laboratory QC results. Extended data packages including verifiable raw data and instrument logs are included as Attachment 3. Results from another QA laboratory, Curtis and Tompkins, Berkeley, CA, subcontract laboratory to SPDL, were also received. These are included in Attachment 3 following the CKY package.

Analysis was performed according to EPA SW846 method 8080 using a gas chromatograph equipped with dual capillary columns and dual electron-capture detectors configured to permit simultaneous second-column confirmation. In the case of analysis for PCBs only, a DB1701 bonded-phase capillary column was employed; pattern recognition served as the means of qualitative identification. Quantitation was performed by measuring the areas of four principal peaks associated with a particular Aroclor mixture.

4.1.1 Holding Times

All samples were extracted and analyzed within allowable holding times except for two matrix spike/spike duplicate pairs which were reanalyzed due to low recoveries. The reanalyses confirmed that a matrix interference was responsible for the low recoveries.

4.1.2 Method Blanks

Method blanks were performed at the required frequency. All were free of contamination.

4.1.3 Matrix Spike/Matrix Spike Duplicate Recoveries

Composite Groups A, C, D, E and G were spiked in duplicate with Aroclor 1260. The results of matrix spike/matrix spike duplicate (MS/MSD) sample recoveries are summarized in Table 4-1.

Table 4-1
Summary of Matrix Spike Recoveries

Composite Group	MS, %R	MSD, %R	RPD	Control Limits	
				MS, %R	RPD
A	64	83	25*		
C	52*	63	19		
D	94	100	6	55-145	< 20
E	121	133	10		
G	47*	55	15		

* These MS/MSD % recoveries and RPD were outside control limits

MS = matrix spike

MSD = matrix spike duplicate

RPD = relative percent difference

4.1.4 Laboratory Control Samples

Laboratory Control Samples were run at the required frequencies. All recoveries were within acceptance limits of 50-150 percent.

4.1.5 Surrogate Recoveries

Two surrogates were used, tetrachloro-1,3-xylene (TCX) and decachlorobiphenyl (DCB). A number of recoveries were outside the acceptance limits of 50-150 percent, especially in connection with the analysis of concrete samples. Reanalysis confirmed that low recoveries were the result of matrix interferences. These results are summarized by matrix in Table 4-2.

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Table 4-2
Summary of Surrogate Recovery Results*

Matrix	# Analysis	TCX, %R		DCB, %R		TCX,	DCB,
		Max	Min	Max	Min	% Acceptable	% Acceptable
Wood	8	117	73	107	24	100	88
Brick	1	84	84	81	81	100	100
Concrete	12	140	56	78	18	100	17
Water	5	81	68	73	41	100	80

* Includes analyses and reanalyses of discrete and composited samples

4.1.6 Instrument Performance and Calibration

An initial five-point calibration was performed on a mixture of Aroclors 1016 and 1260. The relative standard deviations were less than 20 percent. A subsequent five-point calibration was performed for Aroclor 1254; again, the relative standard deviation was in compliance. Continuing calibration verifications were performed with each daily analytical batch. All continuing calibrations were within acceptance limits.

4.1.7 Equipment Rinsates

One equipment rinsate consisting of the final rinse of the sampling equipment decontamination process was collected at the end of each day of PCB sampling activity and submitted for laboratory analysis. PCBs were not detected. All surrogate recoveries except one were in control (see Table 4-2).

4.1.8 Field Duplicates and QA Split Samples

The results are compared in Table 3-1. Field duplicates mainly provide a measure of field sampling precision while the QA split samples provide an indication of qualitative and quantitative laboratory accuracy. Examined as a whole, the results confirm the presence of PCB contamination at one wall area and all three concrete floor areas. However, a detailed review indicates several disagreements.

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The results of field duplicates taken from areas C, E and F are in qualitative agreement. One of the field duplicate pair collected from area G gave a nondetected result while the other analyzed for a trace amount of Aroclor 1260. The detected results for the pair from area F differ by a factor of nine. These discrepancies are attributable to the heterogeneous nature of the matrix, particularly concrete.

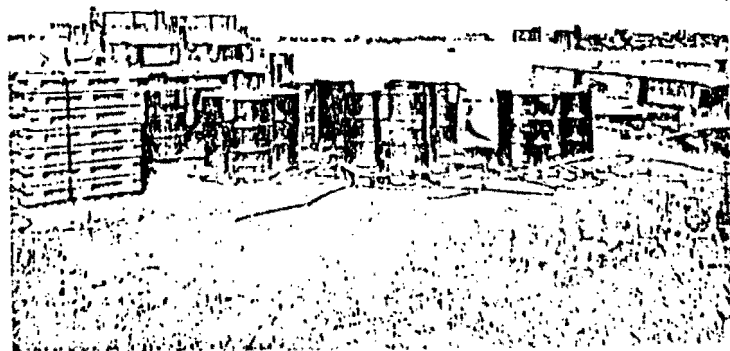
Better agreement is observed between the field duplicate/QA split sample pair except in the case of the area E sample. The primary laboratory reported an absence of detectable PCBs in the field duplicate discrete while the QA laboratory gave a result that was 20-times greater than that for the area E composite sample. Both laboratories identified the PCB as Aroclor 1254. The result found by the QA laboratory, 7.1 mg/kg, the highest value reported for any sample, is below the nonimpervious standard (based on soil) of 25 mg/kg for restricted and 10 mg/kg for nonrestricted use.

4.1.9 Overall Data Quality Assessment

Although a number of surrogate recoveries and matrix spike recoveries were out of compliance with control limits based on the analysis of clean soil samples, reanalysis was performed to demonstrate that these deviations were the result of matrix effects. Recoveries of the late-eluting surrogate, DCB, in concrete samples were typically below project-specified acceptance limits. These low recoveries were attributable to matrix interferences and not necessarily indicative of poor extraction efficiency. The quality of the data suffices to establish the presence of PCB contamination within the matrix of the concrete floor and within one wall area.

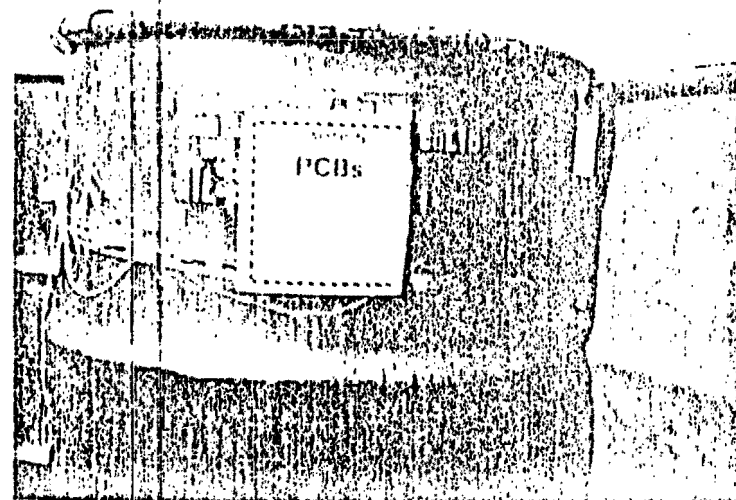
4.2 CONCLUSIONS

Tooele Army Depot has documentation for the numbers and types of transformers that have been stored in the Building 659 PCB Storage Area (Attachment 1). According to available documents, all types of transformers were previously stored at this site: (1) non-PCB transformers (0-50 ppm), (2) PCB-contaminated transformers (50-500 ppm), and (3) PCB transformers (> 500 ppm). In addition, in response to a PCB spill reported on the outside of Building 659, 55-gallon drums of soil contaminated with PCB were stored in the Building 659 PCB Storage Area.



OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: (18) 55-gallon drums containing
PCB oil
Location: U.S. Army Depot
Tooele County Tooele State Utah
Date: 10-21-80 Time: 10:30 AM
Photographer: Rod W. Glabe
Film: Kodak ASA
Location of Negative: _____
File: # _____
Witness: Kevin Mullen
Process: _____
Paper: _____



OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: PCB label on 55-gallon drum
containing contaminated soil
Location: U.S. Army Depot
Tooele County Tooele State Utah
Date: 10-21-80 Time: 10:30 AM
Photographer: Rod W. Glabe
Film: Kodak ASA
Location of Negative: _____
File: # _____
Witness: Kevin Mullen
Process: _____
Paper: _____

Transformer oil spills have been documented at the PCB Storage Area. Appropriate reporting and decontamination have been performed accordingly to TEAD's "Handling of Items Containing Possible Concentrations of Polychlorinated Biphenyls (PCB's) in Building 659" Operating Procedure Number 7800.14. Analytical results have indicated that the transformer oil spilled from non-PCB transformers (0-50 ppm). There are no records available for transformer oil spilled from PCB-contaminated transformers (50-500 ppm) or PCB transformers (> 500 ppm).

The site characterization field activities conducted in the first two weeks of June 1996 provided additional information as to the presence or absence of PCBs on the floors and walls of the PCB Storage Area. In all composite or discrete samples (concrete, wood and masonry), the maximum PCB concentration was 7.1 mg/kg, which is below the non-impervious standards (based on soil) for restricted (25 mg/kg) and nonrestricted (10 mg/kg) use. Analytical results support a no removal action for these low-level contaminated non-impervious materials. However, now that the presence of PCBs is established, the solid surface PCB standards must be addressed.

The Building 659 PCB Storage Area site characterization indicates PCB contamination on the concrete floors and wood walls. This PCB contamination requires removal prior to release for nonrestricted use. Requirements for decontaminating spills in nonrestricted areas can be accomplished by a double-wash/rinse method (40CFR761.123). Therefore, all concrete floor areas within the storage area boundaries should be decontaminated prior to testing for closure status. In addition, PCB oil stains were detected on the walls as reported in wood chip samples (Composite Group C). These stains should be decontaminated prior to testing for closure status. Target decontamination concentration levels for nonrestricted use areas are 10 µg/100 cm² per the standard wipe test (40CFR761.123).

5. REFERENCES

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- Jacobs Engineering Group 1996a. *Site Survey Workplan for Confirmation Sampling and Surveying for Closure of Building 659 PCB and Radiological Storage Areas. Volume I - Part A: Workplan Summary, Part B: Field Sampling Plan, and Part C: Quality Assurance Project Plan*. Prepared for U.S. Army Corps of Engineers, Contract No. DACA 05-92-D-0040. 28 May.
- Jacobs Engineering Group 1996b. *Site Survey Workplan for Confirmation Sampling and Surveying for Closure of Building 659 PCB and Radiological Storage Areas. Volume II - Part D: Health and Safety Plan*. Prepared for U.S. Army Corps of Engineers, Contract No. DACA 05-92-D-0040. 28 May.
- Jacobs Engineering Group 1996c. *Weekly Field and Laboratory QC Report for Building 659 PCB Storage Area and Radiochemical Storage Area*. Prepared for U.S. Army Corps of Engineers, Contract No. DACA 05-92-D-0040. 17 July.
- State of Utah, Department of Environmental Quality (UDEQ), Division of Solid and Hazardous Waste, 1996. *Hazardous Waste Management Rules*. 15 February.
- Tooele Army Depot (TEAD). 1993. *Guidelines for Management of Hazardous and Solid Wastes Generated by Installation Restoration Activities*. Industrial Risk Management Policy Statement #94-EP-02. October.
- U.S. Army Corps of Engineers (USACE). 1995. *Confirmation Sampling and Surveying for Closure of Building 659, PCB and Radiological Storage Areas, Tooele Army Depot, North Depot, Utah*.
- U.S. Army Environmental Center. 1994. *Tooele Army Depot—North Area, Record of Decision for Operable Units 5, 6, 7, and 10*.
- U.S. Environmental Protection Agency (EPA). 1992. *Test Methods for Evaluating Solid Waste, Physical/Chemical Methods*. SW-846. Third Edition and update. Washington, DC: Office of Solid Waste and Emergency Response. November.
- U.S. Environmental Protection Agency (EPA). 1986. *Field Manual for Grid Sampling of PCB Spill Sites to Verify Cleanup*. Office of Toxic Substances. Washington, DC: EPA/560/5-86-017. May.
- U.S. Environmental Protection Agency (EPA). 1985. *Verification of PCB Spill Cleanup by Sampling and Analysis*. Office of Toxic Substances. Washington, DC: EPA/560/5-85-026. August.
- U.S. Environmental Protection Agency (EPA), Utah Department of Environmental Quality (UDEQ), U.S. Department of the Army. 1991. "Federal Facility Agreement Under CERCLA Section 120, Tooele Army Depot, North Area."

Attachment 1
Historical Records Search

December 3, 1980

PCB Inspection
Army Depot - Tooele, UT

8AH-TS

Robert W. Harding, Chief
Field Operations Section

On 10/31/80, at 9:00 a.m., Kris Mullen and I went to the U.S. Army Depot in Tooele, Utah to inspect two PCB electrical transformers which were punctured by a fork lift while being crated to be moved from outside storage to inside storage on the base. We also wanted to check on the clean-up procedures used after the incident.

We showed our EPA credentials to Mr. Ray Johnson, director of the Engineering and Environmental Control Branch, and to Mr. Larry Fisher, environmental coordinator. I issued a TSCA Notice of Inspection and an Inspection Confidentiality Notice to Mr. Fisher. I mailed a copy of the TSCA Inspection Confidentiality Notice to the Depot Commander, Jerry Patterson. I issued a Receipt for Samples to Mr. Fisher for a copy of the PCB spill history file and photos of the PCB spill site.

According to Mr. Johnson and Mr. Fisher, the spill occurred on 9/12/80, as transformers were being recrated for transfer from outside storage to indoor storage. A fork lift punctured the transformers and the oil leaked out onto the ground.

The depot was built in 1942 as a temporary facility. It covers several square miles and has 4,000 employees. The operation is an equipment rebuilder and supplier for the U.S. Army.

We found that a list of each transformer's serial number and contents (PCB oil, non-PCB oil, etc.) is being completed. The transformers that contain PCB are being properly marked. Transformers with no indication of PCB on the manufacturer's label are treated as PCB transformers until oil samples are analyzed. The Aberdeen Proving Ground Lab in Maryland is conducting the sample analyses.

All out-of-service transformers are stored in Building 659 which has a new roof and a concrete berm installed around the edge of the concrete floor. The 440 55-gallon drums of contaminated soil from the 9/12/80 spill will also be stored in the building. The building does not have any windows and is kept locked.

Additional 55-gallon drums are being acquired for the small amount of contaminated soil left to clean up. Labeling of PCB contaminated transformers is being done as lab analyses are received. Drums of contaminated soil will be moved into storage at Building 659, along with the 18 drums of PCB oil drained from the leaking transformers.

Rod W. Glebe

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Tooele Army Depot - page 2

Attachments:

1. Notice of Inspection
2. Notice of Confidentiality
3. Receipt for Samples
4. Depot Spill Report
5. Photos

8AH-TS:GLEBE:m1:12/3/80

bcc: Mullen

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Appendix II

U.S. Environmental Protection Agency
NOTICE OF INSPECTION
UNDER THE TOXIC SUBSTANCES CONTROL ACT

Name of Firm: Tooele US Army Date Inspection Commenced: 10-31-80
Firm Address: Depot Hour: 10 AM
Tooele Utah EPA Regional Office Address: (type)
84094 Pesticides and Hazardous Materials
1860 Lincoln St
Denver, Colo. 80295

Reason for Inspection:

☒ For the purpose of inspecting (including taking samples, photographs and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with such premises have been complied with.

☐ For the purpose of inspecting (including taking samples, photographs and other inspection activities) a conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures or articles within or associated with the conveyance have been complied with.

☐ In addition, this inspection extends to (circle appropriate letters):

- A) Financial data
- B) Sales data
- C) Pricing data
- D) Personnel data
- E) Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

Name of Person to Whom
Notice of Inspection Was Given:

Signature of EPA Employee:

Larry Fisher

R. W. McLe

DATE 10-31-80

Environmental Coordinator
TITLE

C.S.O.
TITLE

Distribution: one copy Plant Manager
one copy PCB Violation Coordinator
one copy Inspector's Files

DATA INSPECTION CONFIDENTIALITY NOTICE

United States Environmental Protection Agency

Regional Address: 1800 Lincoln
Denver Colo 80295

Facility Inspection: Tooele Depot

Name of person at the facility
to whom this notice given:

Date Inspected: 10-31-80

Larry Fisher

Address of Facility: Tooele US Army
Depot

Environmental Coordinator
TITLE

Tooele utah 84074

Name of chief officer
of business: Col Terry Patterson
Commander

Name of EPA Inspector: Rod W. Gebe

EPA. ASH-P
Address: 1800 Lincoln

Date mailed to chief
officer:

Denver, Colo. 80295

It is possible that EPA will receive public requests for release of the information obtained by inspectors during inspection of the facility indicated above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 U.S.C. 552, EPA regulations issued thereunder, 40 CFR Part 2, and the Toxic Substances Control Act Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the agency determines that the data contains information entitled to confidential treatment.

In order to facilitate the Agency's timely response to any public inquiries, while giving due consideration to your company's right to request confidentiality, please provide us with a statement specifying any information which our inspection of the above indicated facility may reveal which you believe should be entitled to confidential treatment.

Your statement should be addressed to Karen Passavanti-Gross (RESPONSIBLE EPA OFFICIAL) and should reach this address no later than 30 days after your receipt of this notice. Failure by your firm to submit, within the 30 day time period, a written request that information be characterized as confidential or privileged will be treated by EPA as a waiver by your company of any claims for confidentiality regarding the inspection data and the data will be made available to the public without further notice to you.

10-31-80
Date received by owner/operator

Signature of Plant Manager

Distribution: one copy Plant Manager
one copy Chief Officer of Business
one copy PCB Violation Coordinator
one copy Inspector's Files

U.S. Environmental Protection Agency

Receipt for Samples

Regional Address:

Environmental Protection Agency
Region VIII
1050 Lincoln St., Suite 103
Denver, CO 80292

Name of Plant Manager
or Similar Official:

Larry Fisher

Firm Name: US Army

Depot

Firm Address:

Tooele, Utah
84674

Sample Numbers: RG 801031-1 thru 5

Samples Collected: (Describe fully the time, place, date and type of sample, number of containers for each type of sample)

4 photos of PCB spill area at US Army Depot Tooele Utah
10 AM 10-31-80 sample #'s RG 801031-1 thru 4
1 copy of episode statement from Junior Keins sample =
801031-6

Acknowledgement of Plant Manager or Similar Official

The undersigned acknowledges that the samples described above have been collected:

Signature:

[Signature]

Title: Environmental Coordinator

Duplicate Samples for each Type of Sample Taken:

<u>Sample #'s</u>	<u>Requested and provided</u>	<u>Not requested</u>
RG 801031-1 thru 4	provided	

Name of person who collected samples: Rod W. Ebe

Title of Collector: C S C

Signature of Collector: *[Signature]*

Distribution: one copy to Facility Plant Manager
original to PCB Violation Coordinator
one copy for Inspector's Records

SS

Spill History File

86
RG 801031-3

SWORN STATEMENT			
For use of this form, see AF 120-45; the proponent agency is Office of The Deputy Chief of Staff for Personnel.			
LOCATION Tooele Army Depot	DATE 23 Sep 80	TIME 1130 hrs	FILE NUMBER
LAST NAME, FIRST NAME, MIDDLE NAME KERNS, JUNIOR D.	SOCIAL SECURITY NUMBER 488-52-7214	GRADE/STATUS 1LT	
ORGANIZATION OR ADDRESS Tooele Army Depot, Tooele, Utah			

I, Junior D. Kerns, WANT TO MAKE THE FOLLOWING STATEMENT UNDER OATH

On Friday, 12 September 1980, the Environmental Office received a call from Sgt. Branch indicating that two (2) transformers had been damaged while being uncrated and that they were leaking oil onto the ground. Larry Fisher, the Environmental Coordinator and I were away from the office at the time the call was received, at about 1040 hours. We were given the message at about 1050 hours and went directly to the spill site after confirming the location over the phone. We met Sgt Branch at Building 659, the PCB permanent storage facility, and then went to the spill site. Lot 675C in the retrograde yard.

Both transformers were sitting in a row of about nine (9) that were being recreated (or re-palletized) prior to movement to Building 659. Although there appeared to be two varieties of transformers (as they were different colors, different configurations, and different external sizes) I now believe they were all the same stock number 6120-00-B50-1746. Both contained 645 gallons of transformer oil and were manufactured by Westinghouse; the serial numbers also appeared to be in the same general sequence.

The light gray transformer, serial number PCU 715613 was assigned sample number JK 1835. It had apparently been damaged by the forks on a forklift, as two of the fins had marks where they had been run into. Luckily the break on the one fin occurred at the top of the transformer. We estimated that about 10 gallons of oil had spilled with a potential for another 10, or 20 total. Sgt. Branch had taken a piece of wood and wedged into the hole at the top of the fin, allowing just a small trickle to flow. An absorbent pad was placed at the base of the fin to absorb most of the dripping oil.

The dark gray transformer, serial number PCU 715613 was assigned sample number JK 1836. It was punctured at the bottom of a fin and was spurting oil about 6 inches into the air when we arrived. About 150 gallons had spilled onto the ground. Because the break was at the low corner, we had Sgt. Branch raise that corner with an all terrain forklift and we placed three boards (est. 6X8) under it to make it the high corner. Sgt. Branch's assistant (an enlisted military whose name I don't remember) drove a wooden wedge and absorbent pad into the hole to slow up the flow.

We directed Sgt. Branch to place a berm around the entire surface area of the spill to prevent spreading of the oil. Sgt Branch and his man left for lunch at about 1130 hours. We left at about 1145 hours. The area had been roped off and our final estimate of how much oil could potentially escape was 620 gallons.

After lunch we discussed the spill with Dennis Bingham, the Facilities Engineer and Ray Johnson, the Engineering Branch Chief. Based on the facts that 75% of the transformers already tested did not have PCB in concentration of more than 50 PPM, the decision was made to treat the spill as an oil spill until testing should prove

EXHIBIT	INITIALS OF PERSON MAKING STATEMENT	PAGE 1 OF 3 PAGES
---------	-------------------------------------	-------------------

ADDITIONAL PAGES MUST CONTAIN THE HEADING "STATEMENT OF ___ TAKEN AT ___ DATED ___ CONTINUED" THE BOTTOM OF EACH ADDITIONAL PAGE MUST BEAR THE INITIALS OF THE PERSON MAKING THE STATEMENT AND BE INITIALED AS "PAGE ___ OF ___ PAGES" WHEN ADDITIONAL PAGES ARE UTILIZED. THE BACK OF PAGE 1 WILL BE LINED OUT, AND THE STATEMENT WILL BE CONCLUDED ON THE REVERSE SIDE OF ANOTHER COPY OF THIS FORM.

STATEMENT (Continued)

otherwise. I mailed the samples immediately and called AEHA (ATTN: Sandy Ehrhardt) to let them know about the samples.

We went back out to the spill site that afternoon at about 1430 hours. A small berm had been placed at the base of the JK 1850 spill. It was saturated so we requested Lt. Diodonet to have a secondary berm placed around the entire contaminated area.

Monday morning we returned to the site; JK 1850 had slowed to a small stream and JK 1851 had stopped. The second berm had not been placed, but the contaminated area had not grown laterally. We again directed Lt. Diodonet to place the secondary berm. We also recommended moving the non-contaminated transformers to another location if possible.

The samples were analysed by AEHA by 1030 hours our time on Tuesday. Both were between 50 and 500 PPM, and therefore classified as "PCB contaminated" transformers. Ray Johnson and Dennis Bingham were notified and at about 1045 hours the TEAD ISOP was activated. The installation Commander and other listed offices on depot were contacted, as were EPA regional offices, DESCOM and DARCOM.

The area was appropriately marked and secured. The non-contaminated transformers were moved out of the immediate area. The Roads and Grounds Section was used to move empty 55 gallon drums to the site. ~~We also arranged to have pumps to remove the remaining oil from the two damaged transformers.~~ *A crane was used to lift transformers up so that they could be cleaned for reuse. 10-31-50*

On Wednesday the oil was transferred to drums. About 500 gallons were salvaged, indicating less than 400 gallons had spilled onto the ground. The remaining barrels were moved to the area and the ground clean up began.

Contaminated soil was dug up and placed in the drums. All the drums have been marked and will be moved to the temporary storage facility for hazardous waste until a contract can be established to dispose of the material. Before the holes are filled with clean material, soil samples will be taken to assure that all contamination is removed.

(Continued on 3rd Page)

AFFIDAVIT

I, Junior D Kerns HAVE READ OR HAVE HAD READ TO ME THIS STATEMENT WHICH BEGINS ON PAGE 1 AND ENDS ON PAGE 3. I FULLY UNDERSTAND THE CONTENTS OF THE ENTIRE STATEMENT MADE BY ME. THE STATEMENT IS TRUE. I HAVE INITIALED ALL CORRECTIONS AND HAVE INITIALED THE BOTTOM OF EACH PAGE CONTAINING THE STATEMENT. I HAVE MADE THIS STATEMENT FREELY WITHOUT HOPE OF BENEFIT OR REWARD, WITHOUT THREAT OF PUNISHMENT, AND WITHOUT COERCION, UNLAWFUL INFLUENCE OR UNLAWFUL INDUCEMENT.

WITNESSES:

ORGANIZATION OR ADDRESS

ORGANIZATION OR ADDRESS

(Signature of Person Making Statement)

Subscribed and sworn to before me, a person authorized by law to administer oaths, this 31 day of November, 19 50

(Signature of Person Administering Oath)

(Typed Name of Person Administering Oath)

(Authority To Administer Oaths)

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STATEMENT OF KERNS, JUNIOR D.
TAKEN AT TOOELE ARMY DEPOT,
CONTINUED"

Because of the size of the spill (less than 1000 gallons), it was not reportable as an oil spill, however, once it was determined to be a PCB spill, the ISCP was followed.

END OF STATEMENT

PAGE 3 OF 3

Junior D. Kerns



OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: area where PCBs contaminated
was removed
 Location: U.S. Army Depot
Tooele County: Tooele State: Utah
 Date: 10-31-80 Time: 10:30 AM
 Photographer: R. A. D. W. G. 141
 Film: Polaroid ASA
 Location of Negative:
 File:
 Witness: Kris Muller
 Process:
 Paper:



OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

Subject: 440 55-gallon drums containing
PCB contaminated soil
 Location: U.S. Army Depot
Tooele County: Tooele State: Utah
 Date: 10-31-80 Time: 10:30 AM
 Photographer: R. A. D. W. G. 141
 Film: Polaroid ASA
 Location of Negative:
 File:
 Witness: Kris Muller
 Process:
 Paper:

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

February 19, 1981

Transmittal of PCB Violation Case
Tooele Army Depot - Tooele, UT

8AH-TS

Lance Vinson, Director
Enforcement Division

Transmitted herewith is the evidence to support the suspected violations of 40 CFR 761, promulgated under Sections 15(1)(C) and 6(e) of the TSCA.

On October 31, 1980, Rod Glebe and Kris Mullen conducted a PCB inspection at the subject facility in response to a report that two large PCB transformers had been punctured by a fork lift while being moved. This was confirmed. The scope of the inspection was limited to the clean-up and the PCB storage facility.

In addition, it was revealed that about 1000 gallons of PCB-contaminated transformer oil had leaked from the transformers onto the ground. The clean-up resulted in 440 55-gallon drums of contaminated soil and 18 55-gallon drums of contaminated oil being stored for disposal.

Henry Bonzek conducted a follow-up PCB inspection on January 29, 1981, to check on the clean-up, storage for disposal, and PCB records. He found a number of violations, including the 440 and 18 55-gallon drums still stored for disposal outside a proper storage facility.

The following violations were observed:

Inadequate storage facility	761.42(b):
Inadequate Records	761.45(a)(1)(f)
	761.45(b)(1)
	761.45(b)(3)(i)
	761.45(b)(3)(iii)
	761.45(b)(4).

There is no Judge Advocate General at Tooele Army Depot. Correspondence should be addressed to:

Commander
Tooele Army Depot
ATTN: Legal Office
Tooele, UT 84074

Robert L. Duprey, Director
Air & Hazardous Materials Division

Attachments:			CONCURRENCES				
SYMBOL	CSO Report (Glebe)	8AH-TS	8AH-TS-5ENCH:ml:2/19/81	bcc	Glebe	Mullen	Bonzek
SURNAME	Benz	Holmes	Johnson				
DATE	2-19-81	2-25-81	2/25/81				

EPA Form 1320-1 (12-70) OFFICIAL FILE COPY

HTR.

Case No: US/ 318

*SPCC No:

*I.D. No: C 8 / V /

Reported to EPA:

Date: 8/07/25 Time: 1020

By: *NRC*

Organization:

Address:

Zip

Phone No: ()

County: Twile

State: Utah

*Nearest City: London *Zip 92037

Casco - ... River 159 m above sea level Aug 23 July

On other occasions at Bldgs 667 and 617 South end. for a total expenditure of about 100 millions
7 people have chosen at dispensary.

Receiving Waters . *Threatened:

Discharging Facility: _____ Owner/Operator (if different) _____

Name: _____

Address:

Zip: _____

Phone No: ()

Mitigation and Disposal:

Report received by:
*Entered by Coder

25. 7. 2014/2015

OVER

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TELEPHONE CONVERSATION REPORT

DATE: 8/08/05 TIME: 0930 FILE: U81318
FROM: Don Hildon PHONE: 801/533-6146
TITLE & ORGANIZATION: Ut St Health - Water Dept

TO: Fon PHONE: 2468
TITLE & ORGANIZATION: _____

SUBJECT: PCB problems @ Toole Depot.

SUMMARY OF TELEPHONE CONVERSATION:

He talked to Dave Woodworth on 8/5-
Woodworth is Env. Engr working for
Larry Fisher - Toole Env. Coord.
801/833-3108.

According to Woodworth:

- Bldg's noted were specially designed
for storage of PCB containers.
- No known spillage outside Bldg's
- ~~7/23~~ 7/23 - one worker treated in
base dispensary for skin contact
w/PCB
- 8/3 - 2 workers treated for skin
contact. - TOWR

COPIES TO: B. Harding - PAH FILE _____

TELEPHONE CONVERSATION REPORT

DATE: 810803 TIME: 1900 FILE: 4813A8
FROM: Ensign Ambrozewicz PHONE: 800/424-8802
TITLE & ORGANIZATION: NRC

TO: FON PHONE: _____
TITLE & ORGANIZATION: _____

SUBJECT: Repeat of earlier report - PCB spills

SUMMARY OF TELEPHONE CONVERSATION:

Tooele Army Depot, Tooele County, Utah
Call from Jeff Panner - Home address
1000 N 325E Apt C Pleasant Grove, UT 84062
ph 801/785-0521. #1 Doesn't want his
name used since he works at the Depot)

Has been moving transformers at the
Depot the past 2-3 weeks. transformers
are and have been leaking. 30-40 gal
on floor inside Bldg 659. Oil on
ground at NW corner of Bldg 679
Sewer system inlet grate across street
from Bldg 679.

Workers on the job without body protection
Panner currently experiencing loss of
sensation in thumb. Worried this may
have been caused by contact w/ PCB.

COPIES TO: Bob Harding FILE _____

PCB
DEPARTMENT OF THE ARMY Ms. Ehrhardt/lm/AUTOVON
U. S. ARMY ENVIRONMENTAL HYGIENE AGENCY 584-3613
ABERDEEN PROVING GROUND, MARYLAND 21010

REPLY TO
ATTENTION OF

SE-RP-MO/WP

7 AUG 1981

SUBJECT: Special Investigation No. 20-44-0664-81, Analysis of Transformer Fluid Samples for Polychlorinated Biphenyls (PCBs), Tooele Army Depot, Tooele, Utah, Follow-up Report, 10 July 1981

Commander
US Army Materiel Development
and Readiness Command
ATTN: DRC SG
5001 Eisenhower Avenue
Alexandria, VA 22333

1. AUTHORITY. Letter, SDSTE-SEF, Tooele Army Depot, Tooele, Utah, 18 January 1980, subject: PCB Analysis for Tooele Army Depot.
2. REFERENCE. Title 40, Code of Federal Regulations (CFR), 1980 rev., Part 761, Polychlorinated Biphenyls (PCBs), Manufacturing, Processing, Distribution in Commerce, and Use Prohibitions.
3. PURPOSE. To determine the presence and extent of PCBs and to provide assistance as requested in the solution of any related technical or administrative problems.
4. FINDINGS. As requested in paragraph 1, results of electron-capture, gas-liquid chromatographic and/or density analyses are inclosed. The PCBs analyzed for included Aroclor® 1016, 1221, 1232, 1242, 1248, 1254, 1260, and 1262. Per 40 CFR 761, subject fluid samples may be categorized as "non-PCB" (less than 50 ppm PCBs), "PCB-contaminated" (greater than or equal to 50 ppm but less than 500 ppm PCBs) or "PCB" (500 ppm PCBs or greater).

® Aroclor is a registered trademark of Monsanto Company, 800 N. Lindbergh Blvd, St. Louis, MO 63166. Use of trademarked names does not imply endorsement by the US Army, but is intended only to assist in identification of a specific product.

HSE-RP-MO/WP

SUBJECT: Special Investigation No. 20-44-0664-81, Analysis of Transformer Fluid Samples for Polychlorinated Biphenyls (PCBs), Tooele Army Depot, Tooele, Utah, Follow-up Report, 10 July 1981

5. TECHNICAL ASSISTANCE. General information as to the disposal of PCB material is included in Inclosure 2. Further information relative to the PCB analysis may be obtained by calling the Project Officer, Ms. Sandra Ehrhardt, AUTOVON 584-3613/2177. Specific information addressing disposal problems may be obtained by contacting the Waste Treatment and Disposal Technology Branch, Directorate of Environmental Quality, USAEHA, Aberdeen Proving Ground, MD 21010 AUTOVON 584-2024.

FOR THE COMMANDER:

2 Incl
as

fr *Alexander P. Schanz*
FRANK E. McDERMOTT
COL, MSC
Director, Radiation and
Environmental Sciences

CF:
HQDA (DASG-PSP)
Cdr, HSC (HSPA-P)
Cdr, FAMC (PVNTMED Actv) (2 cy)
Cdr, DESCOM
Cdr, TEAD (2 cy)
C, USAEHA-Rgn Div West

COPIES RECEIVED

Distr.	Action:	Distr:	Action:
CO		MIS	
XO		PAO	
SGM		QA	
ADJ		RM	
AE		RMFC	
AS		SAF	
CAM		SEC	
PO		SU	
CSO		CLINIC	
EEO		MMC	2
LEG		PDO	
MA		USACC	
CO READING FILE			

ASF ✓



DEPARTMENT OF THE ARMY MS EHRHARDT/eoh/AUTOVON
U.S. ARMY ENVIRONMENTAL HYGIENE AGENCY 584-3613
ABERDEEN PROVING GROUND, MARYLAND 21010

HSE-RP-MO

3 NOV 1981

SUBJECT: Results of Laboratory Analysis for Tooele Army Depot, Tooele, Utah

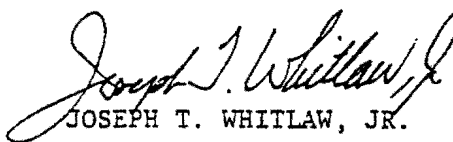
Director
US Environmental Protection Agency
Region VIII
ATTN: 8AH-TS (Paul W. Hanneman)
1860 Lincoln Street
Denver, CO 80295

1. References.

- a. Letter, 8AH-TS, your Agency, 21 October 1981.
 - b. Telephone conversation between Ms. Sandra Ehrhardt, this Agency, and Mr. Paul W. Hanneman, your Agency, 29 October 1981, subject as above.
2. In response to your request, results are attached as the Inclosure.
3. Further questions regarding these analyses may be directed to Ms. Sandra Ehrhardt, Commercial (301) 671-3613/4131.

FOR THE COMMANDER:

1 Incl
as


JOSEPH T. WHITLAW, JR.
COL, MSC
Director, Radiation and
Environmental Sciences

October 21, 1981

REF: SAH-TS

Commander
U.S. Army Environmental Hygiene Agency
Aberdeen Proving Grounds, MD 21010

Attention: HSE-RP-110 (Sandy Ehrhardt)

Dear Ms. Ehrhardt:

I recently conducted a PCB Inspection at Tooele Army Depot in response to a complaint our office received about alleged PCB spills. Mr. Larry Fisher, the Environmental Coordinator at Tooele, said he had taken soil samples from the spill areas and sent to your Lab for analysis for PCBs. He also said he received a verbal report from your office that the Lab results indicated the soil samples from the area to contain less than 50 ppm PCB.

Would you please send me a copy of the Lab report for sample numbers JK1979 and JK1960. Thank you for your cooperation and if you have questions, please call me at (303) 837-6231.

Sincerely,

Paul W. Hanneman
Consumer Safety Officer

SAH-TS:HANNEMAN:bmw:10/21/81

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November 13, 1981

PCB Inspection (PCB82-1)
Tooele Army Depot - Tooele, UT

8AH-TS

Robert W. Harding, Chief
Field Operations Section

I conducted a PCB Inspection at Tooele Army Depot on October 14, 1981, in response to three complaints received by the EPA. The complaints referred to three spills of suspected PCB liquid in buildings 659 and ~~677~~ 679 and possible PCB exposure of three to ten workers (see attached spill reports).

I met the following criteria:

- Credentials were shown.
- Notice of Inspection and Confidentiality Notice was given to Mr. Larry Fisher.
- Receipt for Samples and Preliminary Notice of Inspection Results were mailed 10/15/81.

The following people were involved in the PCB Inspection:

Larry Fisher, Environmental Coordinator, U.S. Department of Army

Mason Walker, Technician, Environmental Services, U.S. Department of Army

Terry L. Thompson, Deputy Director of Supply, U.S. Department of Army

Captain Stephen Wilson, U.S. Army Security

Paul Hanneman, Consumer Safety Officer, EPA

I confined my inspection to the spill complaints, because Tooele had been inspected by two other EPA Inspectors.

The complaints indicated PCB liquid had been spilled in Buildings 659 and 677. I discussed these reported spills with Fisher, Walker & Thompson, and they were aware of Transformer Oil being spilled in Bldg. 659 and Bldg. 677. Fisher had taken two soil samples; Sample #JK1979 is a sample from the spill at Bldg. 677, and Sample #JK1960 was a sample from the spill in Bldg. 659. Fisher said he had received a verbal report from their lab that both spills were less than 50 ppm PCB. I wrote a letter to Sandy Ehrhardt at the U.S. Army Lab, requesting the lab results for sample numbers JK1960 and JK1979. I received their letter November 9, 1981, confirming Fisher's statement (see attachment). I also discussed the claims of worker exposure to suspected PCBs. Fisher and Walker were aware

PCB Inspection (PCB82-1)
Tooele Army Depot, Tooele, UT
Page 2

of a complaint lodged by J. Tanner through the U.S.C.G. about a PCB spill and human exposure to suspected PCB (see attachment). The U.S. Army appointed Captain Stephen Wilson to investigate the complaint and submit finding and recommendations to the Commanding Officer (see attachment). A summarization of the findings of Captain Wilson's report and my findings: Mr. Tanner was moving transformers inside the PCB Storage Facility in Bldg. 659 and probably did come in contact with Transformer Oil. Fisher and Wilson said the transformers Tanner was moving and handling had all been tested for PCBs and contained less than 50 ppm PCBs. Wilson recommended safety procedures to be implemented by Environmental Services and Supply Division for worker protection in handling the transformers in Bldg. 659.

I asked Fisher to show me the official PCB records. He showed me a listing of "PCB transformers in storage at Tooele Army Depot," dated January 21, 1981. The list contains transformer make, serial number, a sample number, locations, and level of PCB contamination. He also showed me the lab results for the 1929 transformers in storage in Bldg. 659 at Tooele. I asked for and received copies of these documents by mail on October 22, 1981 (see attachment). I also received a copy of Walker's monthly PCB Storage Facility inspection checklist, which indicates he inspects the PCB Storage Facility and its contents monthly (see attachment).

We all went to Bldg. 659, which contains Tooele's PCB Storage Facility. There was no PCB mark on the exterior of building. At Door 19 was an oil stain about 6 foot across. This oil stain was the source of Soil Sample #JK1960, which contained no detectable PCBs (see attachment). This oil spill is the same which is the object of two of our complaints. Fisher said the oil spilled out of a transformer while it was being moved into the Storage Facility. Inside Building 659 is the PCB Storage Facility. The building had adequate roof, walls, and the floor had been sealed with an epoxy sealer. The PCB storage area of this building is 180 feet wide, 250 feet long, and surrounded by an 8-inch berm. The berm is constructed of smooth concrete and is continuous except at Door Number 17. 20 feet inside Door 17, the berm is broken and crumbled in three or four spots (see photo attachment). Fisher said this damage is from the impact of heavy equipment moving over the berm to move transformers. Walker noted in his records the berm was broken on his inspection of 9/18/81, and he advised Mr. Allen to submit a work order for repair of the berm. Allen supplied me with a copy of the work order for the repair which he submitted 10/2/81 (see attachment number 11).

Inside Door 17 of Building 659 and setting outside the PCB storage area were three large "Standard Transformers," Serial Numbers 38169, 38170, and 38168. All three transformers were 500 kva, and contained 254 gallons of Pyranol. All three transformers had large PCB marks and were setting on wooden palates and not leaking. Allen and Fisher said those transformers had set there at least since April. Neither man had noticed those PCB transformers were setting outside the PCB storage area.

PCB Inspection (PCB82-1)
Tooele Army Depot, Tooele, UT
Page 3

Inside the PCB storage area were, according to Fisher, 1,929 transformers. The sample records indicate the contents of the storage facility is 1,438 transformers or 74.42% non-PCB, 439 transformers or 22.73% PCB contaminated, and 52 transformers or 2.85% PCB. All the PCB transformers I checked were not leaking, and had large PCB marks. I checked 11130 to 40 transformers, and all of them were stenciled with a sample number and code letter indicating level of contamination. The code is the lettering system to indicate PCB level: "A" is 0 to 49 ppm PCB, "B" is 50 to 499 ppm PCB, and "C" is 500 and up ppm PCB. I asked Fisher and Thompson to explain the final disposition of these transformers. Fisher said all non-PCB transformers would be shipped to Hill Air Force Base, to be rebuilt. PCB and PCB contaminated transformers were going to be held in storage. No determination had been made about disposal or reuse of the transformers.

I gave Mr. Fisher a verbal Preliminary Notice of Inspection because the Base Commander wanted the form mailed to him. I gave him the following summation.

- Official PCB records were incomplete
- PCB storage facility was not marked
- 3 large PCB transformers were outside the PCB storage facility
- Berm in PCB storage facility was broken.

Paul W. Hanneman
Consumer Safety Officer

Attachments:

1. Notice of Inspection
2. Receipt for Sample
3. Confidentiality Notice
4. Preliminary Results of Inspection Spill Report
5. Spill Report
6. U.S. Army Lab Results Book
7. U.S. Army Investigation Report
8. PCB Records
9. PCB Checklist of PCB Storage Facility
10. 2 Letters to U.S. Army
11. Copy of PCB Storage Facility Repair Work Order
12. U.S. Army Sample Results Letter

8AH-TS:HANNEMAN:bmw:11/13/81

HSE-RP-MO

SUBJECT: Special Investigation No. 20-44-0664-81, Analysis of Transformer Fluid Samples for Polychlorinated Biphenyls (PCBs), Tooele Army Depot, Tooele, Utah, Follow-up Report, 10 July 1981

TABLE. Results of Analysis.

<u>SAMPLE NO.</u>	<u>USAEHA NO.</u>	<u>PCB RESIDUE (ppm)</u>
1925	P4818	>50<500
1926	P4819	<50
1927 67/3981	P4820	>50<500
1928	P4821	>50<500
1929	P4822	>50<500
1930 404 ^{SN} 1216	P4823	<50
1931	P4824	<50
1932	P4825	<50
1933	P4826	<50
1934	P4827	>50<500
1935	P4828	>500
1936	P4829	<50
1937	P4830	<50
1938	P4831	<50
1939 404 ^{SN} 1045	P4832	>50<500
1946	P5262	<50

This file only 507

Sandra R. Ehrhardt
for CLIFFORD C. ROAN, Ph.D.
Chief, Pesticide Monitoring Branch
Pest Management and Pesticide
Monitoring Division

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DEPARTMENT OF THE ARMY

TOOELE ARMY DEPOT
TOOELE, UTAH 84074

REPLY TO
ATTENTION OF:

SDSTE-ASF

25 NOV 1981

Mr. Paul W. Hanneman
Consumer Safety Officer
U. S. Environmental Protection Agency
Region VIII
1860 Lincoln Street
Denver, CO 80295

Dear Mr. Hanneman:

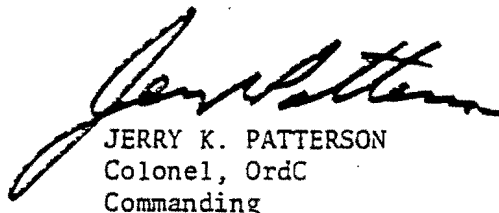
Reference is made to your letter dated October 21, 1981, regarding your PCB inspection conducted on October 14, 1981 (copy attached).

The following measures have been taken regarding your inspection results of probable violations of EPA regulations concerning PCBs:

- a. PCB records are now complete as per Federal Register, Thursday, May 31, 1979, Section 761.45.
- b. PCB storage facility now has PCB warning signs on four sides of building.
- c. The three large PCB transformers have been moved inside the storage facility.
- d. The containment berm which was broken has been repaired.

If you have any questions regarding the above information, please contact Larry Fisher, Environmental Coordinator, Tooele Army Depot, (801)833-2891.

Sincerely,


JERRY K. PATTERSON
Colonel, OrdC
Commanding

1 Incl
As stated

CF: .
Cdr, DESCOM, ATTN: DRSDS-EF w/incl
Cdr, DARCOM, ATTN: DRCIS-A w/incl
Dir f/Supply w/incl

25 NOV 1981

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DEC 2 1981

Transmittal of PCB Violation Case
Tooele Army Depot, Tooele, Utah

8AH-TS

Christine Phillips, Acting Director
Enforcement Division

On October 14, 1981, Paul Hanneman conducted a PCB inspection in buildings 659 and 677 in response to a complaint that PCBs had been spilled and that persons had been exposed. Lab results indicated the oil contained less than 50 ppm PCB.

However, during the inspection the storage and records facility in building 659 was examined. The following violations were observed

Inadequate records 761.45(a)(3)(ii)

It should be noted that previous PCB violations at Tooele have been transmitted to the Enforcement Division on February 19, 1981, and April 14, 1981.

There is no Judge Advocate General at Tooele Army Depot. Correspondence should be addressed to:

Commander
Tooele Army Depot
Attention: Legal Office
Tooele, Utah 84704

/s/ original signed by Robert L. Duprey

Robert L. Duprey, Director
Air and hazardous Materials Division

Attachment

1. Inspector's Report
2. Ltr. from Department of the Army dated Nov. 25, 1981

BENCH:ksb:1044D:12-2-81:3926

CONCURRENCES							
SYMBOL	8AH-TS	8AH-TS	8AH-TS	8AH-TS			
SURNAME	Conrad	Hanneman	Johnson				
DATE	12-2-81	12-2-81	12/2/81				

October 21, 1981

REF: 3AH-TS

Col. Jerry K. Patterson
Commander
Tooele Army Depot
Tooele, Utah 84074

Dear Sir:

Enclosed is a receipt for samples and a Preliminary Notice of Inspection Results for the PCB Inspection I conducted on October 14, 1981.

I would like to thank the Environmental Services and Supply Services for their cooperation.

Sincerely,

Paul W. Hanneman
Consumer Safety Officer

Enclosure

3AH-TS:HANNEMAN:bmw:10/21/81

25



United States
Environmental Protection
Agency

RECEIPT FOR
SAMPLES AND DOCUMENTS

Name of Firm

Toole Army Det

Firm Address

Toole UT
E4074

Inspector Name

Paul W. Hanneman

Inspector Address

EPA/Region VIII
1860 Lincoln
Denver, CO 80295

Name of Individual

Carry Ficker

Title

Environmental Coordinator

Date Collected

10/14/81

Duplicate Samples Requested and
Received: () Yes (X) No

Sample Numbers

The documents and samples of chemical substances and/or mixtures described below were collected
in connection with the administration and enforcement of the Toxic Substances Control Act (TSCA).

Receipt for the document(s) and/or sample(s) described is hereby acknowledged:

PH810714-1 DEPARTMENT OF ARMY REPORT ABOUT PCB SPILL
3/8/81 BY CPT STEPHEN WILSON

PH910714-2 - PHOTO TAKEN BY CARRY FICKER OF THE BROKEN
CONTAINMENT BERM IN BLD 659 -

PH910714-3 STANDARD OPERATING PROCEDURES FOR PCB STORAGE FACILITY
WORKING, REPAIR, AND PROCEDURES

PH810714-4 RECORD OF PCB STORAGE FACILITY MAINTENANCE
CHECKLIST

Signature of Inspector

Paul W. Hanneman

Title

Consumer Safety Officer

Signature of Owner, Operator or Agent

Title

HSE-RP-MO

SUBJECT: Results of Laboratory Analysis for Tooele Army Depot, Tooele, Utah

TABLE. Results of Analysis.

<u>TOOELE ARMY DEPOT SAMPLE NO.</u>	<u>USAEHA NO.</u>	<u>PCB RESIDUE (ppm)</u>
JK 1960	SP 5261	ND*
JK 1979	SP 5279	28

*Not detectable. The lower limit of detectability for PCBs in these soil samples is 1 $\mu\text{g/g}$ (ppm).

February 13, 1981

PCB Inspection (Follow-up)
Tooele Army Depot - Tooele, UT

BAH-TS

Robert W. Harding, Chief
Field Operations Section

On January 29, 1981, as a follow-up to a previous PCB inspection of this facility conducted by Rod Glebe on October 31, 1981, I returned to the Tooele Army Depot to determine the PCB storage records required by the PCB regulations were being maintained. I showed my credentials to Mr. J. Raymond Johnson, chief, Engineering & Environmental Control Branch. I prepared a TSCA Notice of Inspection form, which was signed by Mr. Johnson and I gave a copy to him.

Mr. Johnson said that sample test results for all but about 85 of the roughly 2000 used transformers stored at this facility had been received and a document titled "PCB Transformers in Storage at Tooele Army Depot" had been prepared showing the results. When the remaining results are obtained, a copy will be forwarded to the Grand Junction office.

I was introduced to 1st LT Junior Kerns, environmental engineer. He and I drove to Building No. 659 where all the transformers were being stored so that I could determine if they were marked according to regulations. All but three of the transformers were being stored as per regulation. However, the three being stored in Bldg. 659, outside the dyked area, were Standard Transformers with 254 gallons of pyranol in each of them.

I took photographs (Doc. Sample No. HB₁-810129) of Standard Transformer Serial 34169. All PCB and PCB-contaminated transformers were marked with the required PCB mark. However, none of the transformers were marked with the date placed into storage. In addition, LT Kerns could not find the three Standard Pyranol Transformers in "PCB Transformers in Storage at Tooele Army Depot." I took additional photographs of the transformer/capacitor storage area, as well as of several transformers and capacitors in the storage area. LT Kerns said that the stored PCB spilled items, which Rod Glebe had investigated, were still in the same location as during the initial inspection.

FINDINGS AT TOOEELE ARMY DEPOT

- A. Record Keeping: The document titled "PCB Transformers in Storage at Tooele Army Depot" reflects the extensive work done here regarding the testing of all transformers and the marking of all PCB and PCB-contaminated transformers. There are approximately 85 transformers which have not been sampled, but this record will be updated when the test results come in. In addition, there are three Standard Pyranol Transformers which do not appear in this document. LT Kerns was at a loss to say why, except they had recently been received from Hill Air Force Base, Ogden, Utah.
- 28

- B. Marking: All PCB and PCB-contaminated transformers and capacitors were marked with the large, yellow/black PCB mark. None of the transformers were marked with the date placed in storage. However, I was assured that this would be done shortly.
- C. Testing of Transformers: All used transformers have been, or will be, tested to determine if there is any PCB contamination.
- D. Servicing of Transformers: All used non-PCB transformers will eventually be rebuilt and reused. The PCB and PCB-contaminated transformers may be reused or they may be disposed of. However, that determination has not been made yet and won't be made until the summer of 1981. Who will rebuild the transformers has not been determined, either.
- E. Storage for Future Disposal: Whether or how the PCB and PCB-contaminated transformers will be disposed of has not yet been determined. A decision in the matter will be made sometime in the summer of 1981, according to J. Raymond Johnson, chief, Engineering and Environmental Control Branch.
- F. Disposal: The only disposal problem at this time is that of the 55-gallon drums of contaminated soil and oil which came from the earlier spill and clean-up Rod Glehe investigated. All these drums are still being stored outside, according to LT Kerns.
- G. Health & Safety Procedures: All individuals interviewed seemed well aware of the hazards associated with PCBs. All PCB and PCB-contaminated transformers and capacitors were marked (with PCB marks) and stored as per regulations, except for three Standard Pyranol Transformers, which were being stored outside the dyked area of Bldg. 659.
- H. Documents: Copy of "PCB Transformers in Storage at Tooele Army Depot"; I prepared a TSCA Receipt for Samples and Document form and LT Kerns signed it. I gave a copy of this form to him.

There are -- according to the Document "PCB Transformers in Storage at Tooele Army Depot" -- 401 PCB-contaminated transformers (50-500 ppm); 49 PCB transformers (501 ppm - 1000,000 ppm); and six PCB transformers (over 100,000 ppm) in storage at the Tooele Army Depot. Disposition of these transformers has not been decided and won't be until the summer of 1981. All PCB and PCB-contaminated transformers are marked with the large yellow/black PCB mark. However, none of the transformers are marked with the date placed in storage. The PCB transformer/capacitor storage area conforms to PCB regulation requirements and all but three of the PCB transformers are stored in the dyked area. Those three Standard Pyranol (254 gallon) Transformers are stored inside Bldg. 659, but outside the dyked area. Extensive testing and documentation has been completed thus far for the roughly 2000 used transformers in storage at this facility. There were no unusual circumstances noted and it does not appear that

Tooele Army Depot - page 3

additional investigations at this facility are warranted. I gave a copy of TSCA Receipt for Samples and Documents form to LT Junior Kerns.

Henry F. Bonzek, Jr.
Enforcement Inspector

Attachments:

1. Notice of Inspection
2. "PCB Transformers in Storage at Tooele Army Depot"
3. Photographs:

- A. Doc. Sample No. HB1-810129 - Standard Pyranol Transformer #34169
- B. Transformer/Capacitor Storage Area
- C. Transformers and Capacitors in Storage Area

4. Non-PCB Mark
5. Receipt for Samples

8AH-TS:BONZEK:m1:2/13/81

bcc: Glebe

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PCB INSPECTION MEMO

TOOELE ARMY DEPOT

TOOELE, UTAH

ON JAN 29, 1981, AS A FOLLOW-UP TO A PREVIOUS
 PCB INSPECTION OF THIS FACILITY CONDUCTED BY RUD (LESC)
 ON OCT 31, 1981, I RETURNED TO THE TOOELE ARMY
 DEPOT TO DETERMINE ^{IF} THE PCB STORAGE RECORDS REQUIRED
 BY THE PCB REGULATIONS WERE BEING MAINTAINED. I SHOWED
 MY CREDENTIALS TO MR. J. PATRICK JENKINS, CHIEF, ENGINEERING
 & ENVIRONMENTAL CENTRAL BRANCH. ^{— FROTHMAN} A TSCA NOTICE OF INSPECTION
 FORM, WHICH WAS SIGNED BY MR. JENKINS AND I GAVE A COPY
 OF ~~THE FORM~~ ^{to him.} ~~MR. JENKINS~~ MR. JENKINS SAID THAT SAMPLE
 TEST RESULTS FOR ALL BUT ABOUT 85% OF THE CURRENTLY ²⁰⁰⁰
 TRANSFORMERS STORED AT THIS FACILITY HAD BEEN RECEIVED.
 AND A DOCUMENT TITLED "PCB TRANSFORMERS IN STORAGE AT
 TOOELE ARMY DEPOT" HAD BEEN PREPARED SHOWING THE RESULTS
 WITH THE REMAINING RESULTS ARE OBTAINED, A COPY WILL BE
 FORWARDED TO THE GRAND JURY'S GSA OFFICE. [I WAS
 THEN INTRODUCED TO MR. 1ST LT JAMES KOROS, ENVIRONMENTAL
 ENGINEER. HE AND I DROVE TO BUILDING NO. 654 WHERE
 ALL THE TRANSFORMERS WERE BEING STORED SO THAT I
 COULD DETERMINE IF THEY WERE MARKED ACCORDING TO
 REGULATIONS. ALL BUT THREE OF THE TRANSFORMERS WERE
 BEING STORED AS PER REGULATIONS. HOWEVER, THE THREE
~~TRANSFORMERS~~ BEING STORED IN BLDG 654; OUTSIDE THE OTHER
 AREA, WERE ~~NOT~~ STANDARD TRANSFORMERS WITH 25+ GALT
 OF ~~PERSONAL~~ ³⁰⁰⁰⁰ IN THEM. [I took
 PHOTOS (SEE SAMPLE NO. 14) -
 THREE) AND TWO OF STANDARD TRANSFORMER SAMPLE

FINDINGS AT TOOELE ARMY DEPOT

A. RECORD KEEPING: THE DOCUMENT TITLED "PCB

TRANSFORMERS IN STORAGE AT TOOELE ARMY DEPOT" REFLECTS THE EXTENSIVE WORK DONE HERE REGARDING THE TESTING OF ALL TRANSFORMERS AND THE MARKING OF ALL PCB & PCB-CONTAMINATED TRANSFORMERS. THERE ARE APPROXIMATELY 85 TRANSFORMERS ~~THE~~ ^{WHICH} HAVE NOT BEEN SAMPLED, BUT THIS RECORD WILL BE UPDATED ~~AS SOON AS THE INFORMATION~~ WHEN THE TEST RESULTS COME IN. IN ADDITION THERE ARE

⑤ STANDARD PYRAMAL TRANSFORMERS ^{WHICH} ~~THE~~ DO NOT APPEAR IN THIS DOCUMENT. ⑥ LT KEARS WAS AT LOSS TO SAY WHAT ~~EXCEPT~~ ^{EXCEPT} THEY HAD RECENTLY BEEN RECEIVED FROM HILL AIR FORCE BASE, CLEVELAND, OHIO.

B. MARKING: ALL PCB & PCB-CONTAMINATED TRANSFORMERS & CAPACITORS WERE MARKED WITH THE LARGE, YELLOW/BLACK PCB MARK. NONE OF THE TRANSFORMERS WERE MARKED WITH THE DATE PLACED IN STORAGE. ⑦ HOWEVER, I WAS ASSURED THAT THIS WOULD BE ~~done~~ ^{done} SHORTLY.

C. TESTING OF TRANSFORMERS: ALL USED TRANSFORMERS HAVE BEEN, OR WILL ~~SHOULD~~ BE, TESTED TO DETERMINE IF THERE IS ANY PCB CONTAMINATION.

D. SERVICING OF TRANSFORMERS: ALL USED ~~AND~~ PCB TRANSFORMERS WILL EVENTUALLY BE REBUILT AND REUSED. THE PCB & PCB-CONTAMINATED TRANSFORMERS MAY BE

E. STORAGE FOR FUTURE DISPOSAL: WHETHER OR HOW THE PCB & PCB-CONTAMINATED TRANSFORMERS WILL BE DISPOSED OF HAS NOT ^{YET} BEEN DETERMINED. A DECISION IN THIS MATTER WILL BE MADE SOMETIME IN THE SUMMER OF 1981, ACCORDING TO J. RAYMOND JOHNSON, CHIEF, ENGINEERING & ENVIRONMENTAL CONTROL BRANCH.

F. DISPOSAL: THE ONLY DISPOSAL PROBLEM AT THIS TIME IS THAT OF THE 55-GAL. DRUMS OF CONTAMINATED SOIL AND OIL WHICH ~~ARE FROM~~ ^{CAME} FROM THE GARLICK SPILL AND CLEAN-UP. ~~THE~~ ^{THE} PCBs HAVE INVESTIGATED. ALL THESE DRUMS ARE STILL BEING STORED OUTSIDE, ACCORDING TO LT. KERNS.

H. HEALTH & SAFETY PROCEDURES: ALL INDIVIDUALS INTERVIEWED ^W SEEMED WELL AWARE OF THE HAZARDS ASSOCIATED WITH PCB'S. ALL ^{PCB & PCB CONTAMINATION} TRANSFORMERS & CAPACITORS WERE MARKED (WITH PCB MARK) & STORED AS PER REGULATIONS, EXCEPT FOR (3) STANDARD PYRANOL TRANSFORMERS, WHICH WOULD BEING STORED OUTSIDE OF THE DYKES AREA OF BLDG-659.

I. DOCUMENTS: COPY OF "PCB TRANSFORMERS" IN STORAGE AT TOBLO ARMY DEPOT. ^{I prepared} TSCA RECEIPT FOR SAMPLES. A DOCUMENT FORM AND ~~COMPARISON WAS PREPARED~~ ^{by} and Lt Kerns ~~it~~. ~~IT WAS SIGNED BY LT. JAMES KERNS, ENGINEER~~ ^{Wm} ~~and I GAVE A COPY OF THIS FORM TO THE~~ ^{HE} ~~HE~~

3
THERE ARE ~~3~~ ACCORDING TO THE DOCUMENT "PCB TRANSFORMERS
IN STORAGE AT TOOLEY ARMY DEPOT" -- 461 PCB-CONTAMINATED
TRANSFORMERS (50-500 PPM); 49 PCB TRANSFORMERS
(501 PPM - 100,000 PPM); AND (6) PCB TRANSFORMERS (OVER 100,000 PPM)
IN STORAGE AT THE TOOLEY ARMY DEPOT. DISPOSITION OF
THESE TRANSFORMERS HAS NOT BEEN DECIDED AND WON'T
BE UNTIL THE SUMMER OF 1981. ALL PCB & PCB-
CONTAMINATED TRANSFORMERS ARE MARKED WITH THE
LARGE YELLOW/BLACK PCB MARK. HOWEVER, NONE OF
THE TRANSFORMERS ARE MARKED WITH THE DATE PLACED
IN STORAGE. THE TRANSFORMER/CAPACITOR STORAGE
AREA CONFORMS TO PCB REGULATION REQUIREMENTS AND
ALL BUT THREE OF THE PCB TRANSFORMERS ARE
STORED IN THE DYKED AREA. THESE (3) STANDARD
PARALLEL (25A EACH) TRANSFORMERS ARE STORED INSIDE
BLOG 659, BUT OUTSIDE THE DYKED AREA. EXTENSIVE
TESTING & DOCUMENTATION HAS BEEN COMPLETED THIS
FALL FOR THE ROUGHLY 200 USED TRANSFORMERS IN
STORAGE AT THIS FACILITY. THERE WERE NO UNUSUAL
CIRCUMSTANCES NOTED AND IT DOES NOT APPEAR THAT ADDITIONAL
INVESTIGATIONS AT THIS FACILITY ARE WARRANTED. I gave copy of
A TSEA
RECENT FOR SAMPLES & DOCUMENTS ~~to be sent~~ TO LT JAMES
KORRUS

Henry F. Borch

Environmental Inspector

Toxic Substances Branch

DATE PLACED INTO STORAGE. IN ADDITION, LT. KERNS COULD
NOT FIND ~~THAT~~ ^{IN} THE THREE STANDARD PYRAMID TRANS-
FORMERS ~~THE DEPT. OF THE DEPT.~~ "PLB TRANSFORMERS"
IN STORAGE AT TOREE ARMY DEPT. I ~~took~~ ^{took} ADDITIONAL PHOTOGRAPHS
~~WAS TAKEN~~ IN THE TRANSFORMER/CAPACITOR STORAGE AREA, AS
WELL AS ^{of} SEVERAL TRANSFORMERS AND CAPACITORS IN ~~THE~~ ^{THE}
STORAGE AREA. LT. KERNS SAID THAT ^{the} ~~STOOD~~ ^{STOOD} BCB SPILLED
ITEMS, ^{which} ~~WAS~~ ^{WAS} CUD GLOBE HAD INVESTIGATED, ^{was still} ~~WAS~~ ^{WAS} IN
THE SAME LOCATION AS DURING THE INITIAL INSPECTION.

ATTACHMENTS:

1. TSCA NOTICE OF INSPECTION BY J. RAYMOND JOHNSON

2. COPY OF "PCB TRANSFORMERS IN STORAGE AT TOSCO ARIZONA
DEPOT"

3. PHOTOGRAPHS:

A. DOC SAMPLE No 14B, -810129 - STANDARD PYRENE
TRANSFORMER SERIAL 34169

B. TRANSFORMER/CAPACITOR STORAGE AREA

C. TRANSFORMERS & CAPACITORS IN STORAGE AREA.

4. NON-PCB MARK

5. TSCA RECEIPT FOR SAMPLES & DOCUMENTS BY
JUNIOR KERNS

Attachment 2
Weekly Field and Laboratory Quality Control Report

JACOBS ENGINEERING

July 17, 1996

Transmittal:96ff0_13.doc

O: CESPKE-ED-EB
Attn: Mr. Lester Schmittner
1325 J Street
Sacramento, California 95814-2922
(916) 557-7812

FROM: Joel Kushins *Relieved for*
Project Manager
Jacobs Engineering Group
2525 Natomas Park Dr., Suite 370
Sacramento, CA. 95833
(916)568-4802

ON: Contract No. DACA05-92-D-0040, Delivery Order 19
JEG Project No. 27-H103-19, Building 659, Tooele Army Depot, Tooele, Utah

ATTACHED ARE 1 ENCLOSURE 1 PRINTS OF EACH WE RELEASE THEM FOR:
CONSTRUCTION PURCHASE APPROVAL
FABRICATION DESIGN YOUR FILE X

ENCL NO.	DRAWING OR SPEC NUMBER	REV.	DESCRIPTION	DATE
1.		0	Weekly Field and Laboratory QC Report for Building 659 PCB Storage Area and Radiochemical Storage Area	17 July 96

REMARKS

COPIES TO:

JEG

D. Christensen *

L. Schaleger

Project Files

* Transmittal Only

Weekly Field and Laboratory QC Report
27H10319
Building 659 PCB and Radiochemical Storage Area

This report is submitted to satisfy the requirements of the three-phase quality control process. The process would ordinarily call for daily quality control reports (DQSR) and weekly quality control summary reports (QCSR). However, as discussed in the site-specific Quality Control Project Plan, due to the limited field activities for this project, a single QC report consisting of copies of the daily field log entries and an informal QCSR consisting of a summary of each field task or definable feature of work (DFW) is to be submitted at the end of field work in lieu of a weekly submittal.

This report covers field activities for the duration of the project field activities, 4 June through 14 June 1996. The following DFWs are addressed:

- Collection of PCB samples
- Laboratory analysis of PCB samples
- Radiological field survey
- Collection of radiological samples
- Laboratory analysis of radiological samples

Collection of PCB Samples

The preparatory phase meeting minutes of 31 May 1996 are attached (*Attachment 1*). The meeting consisted of a conference call with conferees representing USACE, TEAD and Jacobs in attendance. Both radiological and PCB sampling efforts were discussed; the radiological subcontractor, Brian Rothman, was also included.

The initial phase meeting was held at the site on 4 June 1996 and was conducted by the Project Manager, Joel Kushins. The minutes are enclosed as *Attachment 2*. Field followup activities are documented in the field log notes of Dayton Busch, senior field technician (*Attachment 3*).

The field notes confirm that the PCB sampling effort, which involved the coring and chipping out of concrete floor samples as well as wood and brick samples, proceeded essentially as described in the Sampling and Analysis Plan. Deviations involved the collection of a larger number of QA/QC samples, 28 rather than the 5 targeted in the plan, in order to support the results of the analysis of composited samples.

Six rather than five QA splits were sent to the Army's South Pacific Division Laboratory for confirmatory analysis. Six pairs of discrete field duplicate pairs were analyzed as well as five matrix spike/matrix spike duplicate pairs. Equipment rinsates and ambient blanks were analyzed according to plan. QA/QC in the form of field duplicates and matrix spike/spike duplicate pairs is required on each matrix at a rate of 10%. The addition of a new matrix, brick from the wall separating the north and south portions of the building, necessitated some of the additional QC.

Copies of the chains-of-custody accompanying samples to the laboratories are included as *Attachment 4*.

Laboratory Analysis of PCB Samples

Samples were delivered to CKY Laboratories, Torrance, California, for PCB analysis. Confirmation QA samples (10% of the total) were sent to the Army's South Pacific Division Laboratory, Sausalito, California.

Minutes of the Preparatory Phase meeting between Jacobs Project Chemist, Larry Schaleger, and CKY Laboratory Director, Kam Pang, and Project Manager, Kennette Pimentel, are included as *Attachment 5*. This laboratory was tasked to undertake a detailed compositing scheme as discussed in "Verification of PCB Spill Cleanup by Sampling and Analysis", EPA-560/5-85-026, August, 1985. Special field and laboratory instructions are appended (*Attachment 6*).

Initial phase discussions between Ms. Pimentel and Dr. Schaleger were held on an every-other-day basis. Two questions arose in the course of these calls. The analytical protocol called for discrete (individual) samples to be analyzed only in the event that the results of the analysis of composites indicated the possibility (rather than the certainty) that the closure limit of 25 ppm might be exceeded. Since these results would not be available prior to exceeding the maximum holding time for extraction, the decision was made to proceed with the extractions of the discrete samples. The second issue pertained to the extraction of wood samples. The thimbles for extraction could only hold 5 g rather than the required mass of 10 g of wood. However by reducing the number of samples per composite, it was determined that the required detection limits could be met.

Radiological Field Survey/Collection of Radiological Samples

The initial phase meeting was held at the site on 4 June 1996 and was conducted by the Project Manager, Joel Kushins. Attendees included Beth Pomatto, supervisor of the radiological phase of work and radiological subcontractor, Brian Rothman. A field audit was conducted on 11 June 1996 by J.B. Baird, Jacobs Certified Health Physicist. This followup phase meeting is documented in minutes presented in *Attachment 7*.

The execution and results of the radiological field survey are included in the field log, a copy of which is included as *Attachment 8*. Copies of the chains-of-custody accompanying the samples to the subcontracting laboratory, Lockheed Analytical Services, Las Vegas, Nevada, as well as the QA Laboratory, Armstrong Laboratory, Brooks AFB, Texas, are enclosed (*Attachment 9*).

The following samples were collected and submitted for laboratory analysis:

Tritium/Carbon-14:	11 solids/2 field duplicates/3 QA splits
	14 surface wipes/1 field duplicate/3 QA splits
Gamma spectroscopy:	11 solids/2 field duplicates/3 QA splits
	7 surface wipes/1 field duplicate/1 QA split

Deviations from the Work Plan are detailed in *Attachment 10*. The most significant deviation involved surveying the floors beneath the shelves in grids of 1 meter rather than 3 meter squares as described in the Work Plan. This measure was implemented to simplify the process and avoid confusion.

Laboratory Analysis of Radiological Samples

Minutes of the Preparatory Phase meeting with Lockheed are appended (*Attachment 11*). Followup discussions with the Lockheed Project Manager, Marty Dillon, brought up the fact that the wipe samples for tritium/carbon-14 analysis were extremely oily/dirty and would have to be diluted to compensate for matrix effects. He was informed to proceed with the analysis since the closure criteria for this pair of weak beta emitters were fairly high and likely to be achieved even with the higher detection limits resulting from dilution.

ATTACHMENT ONE

Schaleger, Larry

From: Kushins, Joel
To: Baird, J.B.; Zike, Bruce; Schaleger, Larry; Sextro, Robert; Jesparza; Ischmittner
Cc: Pomatto, Christina; Hess, Rachel; Busch, Dayton; Christensen, Doug; Duerr, Del; Nuss, Linda; Jayanth, Vijaya; delskamp; mmackenzie
Subject: DO 019, Preparatory Phase Meeting Minutes of 30 May 1996
Date: Friday, May 31, 1996 10:39AM

Preparatory Phase Meeting / Conference Call Minutes of Thursday, May 30 (2:00 pm, PDT) for Tooele Building 659 Closure

1) INTRODUCTIONS

- o J. Kushins introduced the attendees:
 - + USACE: Les Schmittner and John Esparza
 - + TEAD: Larry McFarland
 - + JEG: Bob Sextro, Joel Kushins, Larry Schaleger, J.B. Baird, Bruce Zike
 - + RRS: Brian Rothman (retained as subcontractor for continuity on project)

2) REVIEW OF STATEMENT OF WORK (SOW)

- o J. Kushins provided an overview of the SOW objectives.
- o J. Kushins provided an overview of the three-phase quality control process (preparatory, initial, and follow-up phases)

3) DEFINABLE FEATURES OF WORK (DFWS) AND ASSOCIATED ASSESSMENT ACTIVITIES

- o J. Kushins discussed the definable features of work to be performed under the QAPP/FSP scope of work and their relationship to the three-phase quality control process, they are:
 - + Collection of PCB samples
 - + Radiological field survey
 - + Collection of radiological samples
 - + Laboratory analysis of PCB and radiological samples
 - + Verification and evaluation of laboratory analytical results
 - + Comparison of laboratory analytical results to established clean closure criteria
 - + Submittal of requisite deliverables

4) PROJECT ORGANIZATION/PROJECT COORDINATION LINES OF AUTHORITY; ROLE OF QA; ROLE OF H/S

- o J. Kushins presented a revised organization chart and explained the difference between Sr. Health Physicist line authority and "contract" line authority for this project.
 - + Field Supervisor and Site Safety - C. Beth Pomatto
 - + Field Operations - Dayton Busch
 - + Radiological Services - Brian Rothman
- o L. Schaleger briefly discussed QA/QC roles and continued sample tracking.

5) FIELD/SAMPLING PLAN AND WORK SCHEDULE

- o J. Kushins discussed the work schedule from 3 June thru 14 June 96 with the possibility of weekend work.
- o J. Kushins discussed the materials and equipment logistics and site access

6) HEALTH AND SAFETY PLAN

- o B. Zike briefly discussed H/S roles and tail gate meetings
- o J. Kushins discussed the Jacobs Safety Program and our pride for being top in the industry with low work related job injuries.

7) QUALITY ASSURANCE PROJECT PLAN

- o L. Schaleger stated PCB closure criteria and data quality objectives will be met (PCB concrete chip/core samples of 25 ppm and PCB wipe samples of 10ug/100 sq cm)
- o J.B. Baird stated Rad closure criteria and data quality objectives will be met (Will meet current NUREG requirements (QAPP Table C-3))

8) LABORATORY COORDINATION/DATA MANAGEMENT

- o L. Schaleger will coordinate a separate Preparatory Phase meeting w/ the contract laboratories. J. Esparza will be invited to meeting on Monday/ Tuesday, 3/4 June 96.

9) ADMINISTRATIVE ISSUES

o J. Kushins opened dialogue for the following issues and additional action items are listed below (Item 10):

- + Site access and weekend work
- + Waste management (labels and storage)
- + Army Radiation Safety Committee Use Permit requirements

10) ACTION ITEMS

- o Identify NRC contact for review of Closure / Decommissioning Report - J. Kushins & L. McFarland
- o Expanded phone list for w/ night and weekend phone #'s for distribution at Kickoff meeting - J. Kushins
- o Send 2 SAPs (FSP/QAPP) to Evyonne at SPD Lab and confirm schedule for receipt of samples - L. Schaleger
- o Establish "fixed point" monument as point of ref. for sample locations - D. Busch & B. Rothman
- o Procure authorization to conduct field activities from Army Rad. Safety Com. - J. Kushins & B. Rothman.
- o Contact Max Scheiss (801-833-3504) for container labels and approved storage location - D. Busch
- o Contact Larry McFarland (801-833-3504) for site access and keys - D. Busch and B. Rothman
- o Conduct preparatory phase meeting w/ contract laboratories - L. Schaleger and J. Esparza

cc Larry McFarland via facsimile
Brian Rothman via mail

ATTACHMENT TWO

Schaleger, Larry

From: Kushins, Joel
To: Pomatto, Christina; Baird, J.B.; Hess, Rachel; Zike, Bruce; Busch, Dayton; Christensen, Doug; Duerr, Del; Nuss, Linda; Schaleger, Larry; Sextro, Robert; Jayanth, Vijaya; delskamp; jesarpa; Ischmittner; mmackenzie; PFeldman
Subject: RE: DO 019, Initial Phase Meeting Minutes of 4 June 1996
Date: Friday, June 07, 1996 2:53PM

Initial Phase Meeting Minutes of Tuesday, 4 June for Tooele Building 659 Closure.
(NOTE: Meeting minutes follow the format of the preparatory phase meeting minutes to document action items completed)

1) INTRODUCTIONS

- o J. Kushins introduced the attendees:
- + USACE: Les Schmittner, Carl Cole, and Hans Honerlah
- + TEAD: Larry McFarland, Max Scheiss, and Jay Bishop
- + JEG: Joel Kushins, Bruce Zike, Dayton Busch, and Beth Pomatto
- + RRS: Brian Rothman (retained as subcontractor for continuity on project)

2) REVIEW OF STATEMENT OF WORK (SOW)

- o J. Kushins provided an overview of the SOW objectives.

3) DEFINABLE FEATURES OF WORK (DFWS) AND ASSOCIATED ASSESSMENT ACTIVITIES

- o J. Kushins presented the sampling plan work to be performed under the QAPP/FSP scope of work.

4) PROJECT ORGANIZATION/PROJECT COORDINATION LINES OF AUTHORITY; ROLE OF QA; ROLE OF H/S

- o J. Kushins presented a revised organization chart and explained the difference between Sr. Health Physicist line authority and "contract" line authority for this project.
- + Project Manager - Larry McFarland (TEAD)
- + Project Manager's Point of Contact - Max Scheiss (TEAD - week of 3 June 96)
- + Technical Manager - Les Schmittner (USACE)
- + Project Manager - Joel Kushins (Jacobs)
- + Field Supervisor and Site Safety - C. Beth Pomatto (Jacobs)
- + Senior Field Technician - Dayton Busch (Jacobs)
- + Radiological Services - Brian Rothman
- + Field Technician - Shayne Anderson (Kleinfelder - start 10 June 96)

5) FIELD/SAMPLING PLAN AND WORK SCHEDULE

- o J. Kushins discussed the work schedule from 3 June thru 14 June 96 with the possibility of weekend work. Team will work Friday and Saturday w/ Sunday off.

6) HEALTH AND SAFETY PLAN

- o B. Zike conducted a health and safety meeting. "Tail gate" meeting will be conducted every morning.

7) QUALITY ASSURANCE PROJECT PLAN

- o J. Kushins reiterated the need for an exceptional QA/QC program from the team.

8) LABORATORY COORDINATION/DATA MANAGEMENT

- o L. Schaleger conducted separate Preparatory Phase meetings w/ the contract laboratories on 3 and 4 June 96.

9) ADMINISTRATIVE ISSUES

- o J. Kushins opened dialogue:
- + Site access and weekend work-key provided to Beth Pomatto. She has responsibility to return to Larry McFarland. Never leave site open and unattended.
- + Waste management (labels and storage)-Max Scheiss provided labels. Never put material into containers w/o label attached first.
- + Army Radiation Safety Committee Use Permit requirements: Dr. Jay Bishop, RPO gave authorization to conduct field activities in the Rad. Storage Area.
- + Bathrooms are available three warehouses north (Bldg. S687R) and open all weekend.
- + Power is available at Bldg. 659.

+ EPA and/or UDEQ most likely will observe sampling on 10 June 96.

10) ACTION ITEMS- (COMPLETED)

- o Expanded phone list provided to staff.
- + Cell phone was provided for Field team (#801-550-0382)
- o Two (2) SAPs (FSP/QAPP) were sent to Evyonne at SPD Lab
- o "Fixed point" were established to ref. sample locations
- o Authorization was provided to conduct field activities by Dr. Jay Bishop.
- o Max Scheiss provided container labels and approved interim storage at Building 659.
- o Larry McFarland (801-833-3504) provided site access key.
- o Preparatory phase meetings were conducted with contract laboratories.

cc Larry McFarland via facsimile
Brian Rothman via mail

ATTACHMENT THREE

27-H103-19

DATE	ACTIVITY	TIME
6/4/96	ARRIVE TOOLE, JOEL HOTEL	0900
	ARRIVE TOOLE ENV. OFFICE	0930
	ARRIVE BLD 659	0945
	BEGIN EXCLUSION ZONE SET-UP	1000
	MOVE DESK, CHAIN	1030
	BEGIN SITE ORIENTATION	1100
	LEAVE SITE	1230
	PACK ON SITE BLD 659	1500
	BEGIN GRID IN PCB	1600

CONT

COMMENT

LOOKING FOR JOEL, MISSED
HIM AT HOTEL, PROCEED TO
BASE

Lenny McPhanhan OFF. BASE
THIS WEEK. NO JEG PERSONAL
PROCEED TO BLD 659

JOEL, HANS FROM COMPS, MAX
FROM DEPOT. ALL TOGETHER KNOW.

ESTABLISH D.R. 2 AND STAKE
AREA, MOVE IN EQUIPMENT.

FROM TAN END OF BLD. TO
USE, PER COMPS.

JOEL CONDUCTS MEETING

- 1) LOOK INTO CELL PHONE PER JOEL
- 2) PICKUP DRUMS

SECURE BLD 659. ALL IS WELL.

OPEN UP, UNLOAD SUPPLIES,
SETUP C.R. 2. GRID BLD AREA
LAY DOWN GRID SAMPLES

CONT

(2)

DATE
JES

6/4/96

BLD. 659, Toole Depot

Activity

Exit P.C.B.

Time

1715

DEPART SITE

1845

40

9/1

Done

Comment

Complete Grid samples, need
to complete AUTHITATIVE locations
MEET WITH E JOEL, BRIAN, PATON
AND DUCE. GO OVER LOCATION I.D.

Protocol

BLD. 659 SPUR - All is well.

9/1

9/1

Done

27-11-03-19 TOOLE, Anna, Reports

DATE	ACTIVITY	TIME
6/9/96	Arrive SITE	0700

PARP TO ENTER P.C.D.'s 0725

EXIT P.C.D. AREA 0830

Comments

OPEN BLD. JOEL, HANS, DOTH,
Dawn, Dayton

JOEL AND, Final MARK.
OF P.C.D. Sample Location

All location PLACED.
Finalize List of HANDS.

1. ISC - ALCOHOL ✓

2. KLEIN FERRER - SOURCE ✓
ON CALL EA ✓
505-298-4224
C.O.C.'S
CALL BARBARA
AND DELL
CALL SCOTT

3. PICKUP CONZUITA ✓

4. HERTZ - PHONE ✓ CELLPHONE ✓

5. ~~DOCTORS~~ HOTEL ✓

6. COCTAIL ✓ - KLEIN FERRER ✓

7. HAND WARE - ORANGE D.M. ✓
CHALK ✓
MARSH ✓
CHALK ✓

NO ✓
R-3 ✓
300 S. ✓
780 E ✓

CONT

TOOLE Andy DEPOT OLD 659

DATE	ACTIVITY	TIME
6/6/96	ARRIVE OLD 659	0730

	CALL OFFICE	0830
--	-------------	------

	PREPARE TO ENTER P.C.D. AREA	0915
--	---------------------------------	------

	EXIT OLD 659	1115 1145
--	--------------	-------------------------

	RETURN FROM LUNCH	1230
--	-------------------	------

	CONTINUE CONING	1300
--	-----------------	------

CONT

27-H103-19 ACOE

COMMENTS

UNLOCK OLD 659, HANDS DAVID
BETH, DAYTON ON SITE.

CONDUCT TAILGATE. WORK ON
RECEIVING REPORTS FOR CONTRACT

SPEAK W/ LANNY S. ABOUT
C.O.C.'S. HE WILL FOLLOW UP
ON REQUESTS FOR LADDS AND
THANKS.

COME ANOTHER 10 SAMPLE
LOCATION TO 3/4" x 2.5"
TO HELP BE ABLE TO BREAK
OUT WATFENS.

LOCK UP, ALL OF US GO TO LUNCH

CALL SAC ABOUT LADDS, AND
C.O.C.'S. TALK WITH LANNY S.
DOWN TO LAST COUPLE OF

CONT

Took Army Depot and 659

DATE	ACTIVITY	TIME
6/6/96	MAX FROM DEPOT	1530

Completed CONES 1630

~~Out Deal~~

2T-H103-19

A.C.O.E.

COMMENTS

Comes by, C.I.L. to work this week, HE HAS NOTIFIED COPS ABOUT US. SHOULD DO NO PROBLEMS WE ALSO GAVE HIM OUR CELL PHONE #, JUST IN CASE.

For P.C.D.S. - 40 + 4 Q.C.
Closed up and 659 and back.
All is well.

~~Out Deal~~

TOOE ARMY DEPOT BLD 659

DATE	ACTIVITY	TIME
6/7/96	ARRIVE BLD 659	0730

SECURE BLD 659 1145

OPEN BLD 659 1230

ENTER P.C.D. AREA 1500

DECON CORE UNIT 1545

LEAVE SITE TO RETURN 1600

TASK COMPLETE 1730

~~Dayton~~

27 H103-19

ACOE

COMMENTS

OPEN UP, ALL IS WELL. DRY
DAY. L WILL BE WORKING IN
RAD AREA TO DAY. NO P.C.D.
WORK.

GO TO LUNCH, ^{NO} PROBLEMS
CONTINUE W/ RAD SURVEY.

CUT DUPLICATE SAMPLE LOCATION

COMPLETE DECON, EXIT P.C.D.
AREA.

EQUIPMENT. PICK UP R.I. H₂O

RETURN CORE UNIT. NO H₂O
AVAILABLE.

~~Dayton~~

TOOL & Army DEPOT DND 659

DATE	ACTIVITY	TIME
6/8/96	ARRIVE SITE	0830

COMPLETE "E" SECTION 1330

SECURE DND 659 1400

~~Duff Bush~~

27-H103-19 ACOE

COMMENTS

OPEN DND 659, ALLISON
BEGIN PCN SAMPLING - PCN
SAMPLES COMPOSITE GROUP 'E'
RECORD CHISEL/EQUIP BETWEEN
EACH SAMPLE.

402 JAN, LABEL, DOUBLE DABBS
PLACED IN COOKER W/ICE AND
CUSTOMER SEALON COOKER. THEN
VERIFY 4°C STORAGE.
LEAVE FOR DAY. ALLIS WELL.

~~Duff Bush~~

DATE	ACTIVITY	TIME
6/10/96	Arrive DHD 659	0720
	PROCEED w/ SURVEY	0900
	TALK w/ HARRY, JOEL	0910
	MATT FROM KHUEN FIEDEN CALLS w/ H ₂ O SOURCE, FOR ASTM TYPE II	1000
	CONTACT CICY ABOUT SUPPLIES	1030
	LEAVE FOR MOUNTAIN STATE	1130

27-11103-19	ACOE	COMMENTS
		SHANE, FROM KHUEN FIEDEN ON S, FR: DORTH GIVE H-S DRIVE
		DORTH AND SHANE ABOUT LAD QUESTIONS.
		MARK - MOUNTAIN STATE PARK 973-0050 1645W 2200S. 2100S. MAGNA EXIT (R) (L) ASK TO SEND CEN. FOR CONTAINERS, SEND COOKER TO HOTEL. TO PICK UP TYPE II REGENT H ₂ O

Toole Army Depot. DL2659

DATE	ACTIVITY	TIME
6/10/96	RETURN FROM RUN	1400
	PREPARE TO SAMPLE	1430
	POOR EQUIPMENT RINSE	1630
	LEAVE SITE FOR DAY	1730

~~at
get
Rural~~

27 H103-19

ALOE

COMMENTS
2 Gals TYPE II H ₂ O. NO HOLIPAPER.
COMPOSITE GROUP "F", WITH DOCUMENT TRUE LOCATIONS AND SAMPLE D'S AFTER SAMPLE EVENT.
FOR TO DAY'S SAMPLE EVENT.
SAMPLE SECURE, DL2655 SECURE

~~at
get
Rural~~

Tool Army Depot. DHD. 659		
DATE	ACTIVITY	TIME
6/11/96	LEAVE HOTEL	0630
	ARRIVE DHD. 659	0830
	COMPLETE COMP. 'G'	1130
	SHANE IS BACK, W/ LUNCH	1230
	BACK TO SAMPLING	1245

27.11.03.19 ACOE

COMMENTS
TO PICK UP CORRUPT.

PREPARE TO SAMPLE. COMP. 'G'.

SEND SHANE TO LUNCH, STAY
ON SITE IN CASE OF AGENCY.

ARRIVAL
SIT DOWN AND EAT.

FLOYD NICOLLAS

TOOKE Army Depot. BLD. 659

DATE WED	ACTIVITY	TIME
6/12/96	ARRIVE BLD. 659	0715
	REPORT/CONPS/ EPA. REPS ON SITE	0730
	SECOND GENTHMAN - EPA	0900
	EXIT P.C.D. ZONE	0950
	VISITORS MOVE ON TO RAD AREA	1010
	RE-ICE SAMPLES	1030
	V.I.D.'S LEAVE	1145
	LUNCH	1200

CONT

27-1103-19 ACOE

COMMENTS
OPEN BLD. 659.
LARRY McFARLAND, HANS, RICHARD GENTHMAN, FLOYD NICHOLS JACK CONDUCTS MEETING. BASICALLY GOES OVER WORK PLAN AND DEMONSTRATE EACH ACTIVITY TO VISITORS.
RICHARD GENTHMAN JOINS ME IN P.C.D. AREA. AUDITS MY P.C.D. SAMPLING RICHARD IS VERY SATISFIED W/ SAMPLING EVENT, AND LOCATIONS. MEETING MOVES ON TO RAD CONCERNING SEE AND LOG. TO MAIN TAIN 4°C ON SAMPLES WORK ON C.O.C.'S.
EVERYONE IS VERY SATISFIED W/ JACOB'S EFFORTS. GOOD JOB
SECOND BLD. 659.

CONT

TOORLE Army Depot 010659

DATE	ACTIVITY	TIME
6/12/66	Return From Lond	1300

CONT

COMPOSITE D.C.D. SAMPLING	1605
------------------------------	------

Down LAST OF E.D.	1650
-------------------	------

DEPART SITE	1750
-------------	------

~~HD~~
~~cont~~
~~Ken~~

2711103-19

ACOE

COMMENTS

RESUME REMANENCE OF
SAMPLING, COMPOSITE GROUP
D, AND E.

LAST OF SAMPLES TAKEN.
DOWN AND DOWN LAST
E.D. BACK SAMPLE 12.
GROUPS TO I.D. FOR SHIPPING
TOMMOROW. W/ SPLTS. SPOL.

LAST EQUIPMENT BLANK
CONTAINING 122 BELOW WASTE
AND LADDER PICKUP SITE.

LOCK ALD 657 ALL IS WELL

~~HD~~
~~cont~~
~~Ken~~

TOOKE NADY DEPOT ALD 659		
DATE	ACTIVITY	TIME
6/13/96	DEPART HOTEL	0600
	ARRIVE ALD 659	0700
	TASKS ^①	0740
	CALL SACRAMENTO	0900
	LUNCH	1200
	RETURN FROM LUNCH	1230
	GO TO STORE FOR ICE	1425
	RETURN / STORE	1530

(CONT)

27 H103.19 A.C.O.E.
 COMMENTS
 Finish Truck, Pick Up FFD & LINDS AT AIRPORT.
 Talk Gate / MISTAKE ON WHAT NEEDS TO GET DONE AND WHO WILL DO WHAT.
 In packing samples for C.K.Y. AND SPAL. LAD.
 SHANE IS PATCHING COATS, AND SAMPLING WITH DATH RMSA.
 BRIEF JOEL, K WILLIAM ON LAD QUESTIONS. STATUS IS GOOD TO FINISH 6/14/96, NOT WORKING FOR BUSY.
 DATH SAYS TO WORK, & WILL BRING FOOD FOR HIM.
 CONTINUE ON TASKS^① DUGRESS GARD, PATCH WALL.
 READY FOR FINAL PACK OF P.C. 13 SAMPLES.
 COMPLETE PACKING W/ICE OF P.C. 13 SAMPLES.

CONT.

TOOKE AMMO, DEPOT, BLD 659

DATE	ACTIVITY	TIME
6/13/96	SHAW TO LEAVE	1630
(CONT)		

BRYAN D. J. ✓ LOCATION 1700

* Drum picked up →

CHECK COMPLETE. 1820

LEAVE FOR DAY. 1830

9f
cut
Dun

27410319

ACCT

Comments

He will deliver?
2 - accounts for C.K.Y.
1 - for SPDL LAD.
TO FELD-X, AND ACTION CONE
UNIT. TO RENTAL PAPER, HIS TOTAL
IS 40% OF HARP. DEAN A B.G.
HARP.

MEASURE RECORD ALL SAMPLE
LOCATIONS, BOTH P.C.B. AND
R.M. S.A. ON MAPS, AND
BACK GROUP LOCATIONS. MAX
FROM BASE PICKUP P.C.B. DRUMS
ALL ACCOUNTED FOR RESTORATION
OF CORN LOCATIONS LOOKS GOOD.

18
15

TOOLEY Army Depot. SL0659

DATE	ACTIVITY	TIME
6/14/96	DEPART HOTEL	0610

ARRIVE SITE SL0659 0720

PACK AMSA Samples 0740

FINAL LOAD / ENROUTE SL0659
LOCK AND LEAVE

Cont

27 H10319

RCOF

Comments

Arrive to Base. Pick up
last supplies on way in.

Just men and bath today,
Hans left, NARRAN on shore.

DASHI just pack AMSA
Samples, Load, Pick up

* Harry McFinnis made arrangements
for us to drop keys w/

Finn Dept. when we leave
because he will not leave.

* ONLY D.C. Photos, 1-local
of Decon waste water, 1-PPE
SSGL. WASH RAIL, EVERYONE
AGREED W/ID. THAT AMSA
WASTE SHOULD STAY INSIDE
A.M.S.A.

1-COOKER FOR LOCKHART

1-FOR SPDL - HAMSTON

LEAVE SL0659 JUST AS IT
WAS. HAND FOR F.D.

Cont

TOOELE Army Depot BLD 659

DATE	ACTIVITY	TIME
6/14/96 (CONT)	DROP KEYS W/F.D.	1230
	LUNCH	1300
	AT Airport	1350
	AT CELL STONE	1410
	RETURN CAR	1505

[Signature]

27110319

A.C.O.E

Comments

O.K. OUR WORK IS DONE HERE, TO
REPORT

FRIDAY SAMPLES HEARD FOR
CELL PHONE STONE

RETURN PHONE TO REPORT

THATS IT. JOB WELL DONE

ALL STATEMENTS PARTIAL
AND ACCURATE.

[Signature]

ATTACHMENT FOUR

CHAIN OF CUSTODY RECORD TO-A1002

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TD0ELE				LABORATORY NAME & ADDRESS: CKY INC			
PROJECT NUMBER: 27410319				630 maple Ave			
WBS CODE: .				Torrance, CA 90503			

DATE	CONNECTION	TIME	ANALYST	TEST	REMARKS	INITIALS	CONDITION
10-A00010	6/12/96	1310	DD	1	Hot. 8oz glass bottle	NONE	SWB0080 PCB
10-A00011	6/12/96	1320	DD	1	}	}	SWB0080 PCB
10-A00012	6/12/96	1337	DD	1			SWB0080 PCB
10-A00013	6/12/96	1333	DD	1			SWB0080 PCB
Not Handed Follows							

COMMENTS: **Composite -10 thru -13. (Comp Group 'B').**

COLLECTED BY: Deft. Bural	DATE: 6/12/96	TIME: 16:00	TURNAROUND TIME
RECEIVED BY: FEO-X	DATE: 6/12/96	TIME: 16:00	RELINQUISHED BY
RECORD RETURNED BY			DATE
SHIPPING NUMBER: 9630795730			TIME

**INFORMATION IN THIS SECTION
FOR JACOBS USE ONLY**

LOCATION	DATE	TIME	INITIALS
B654N PCB		0.0	
B654N-WP-SR-06		25	NI
B654N PCB		0.0	
B654N-WP-SR-07		25	NI
B654N PCB		0.0	
B654N-WP-SR-08		25	NI
B654N PCB		0.0	
B654N-WP-SR-09		25	NI

SAMPLING COMMENTS:

NOT #
5312022



JACOBS ENGINEERING GROUP INC.
251 S. I. VE. PASADENA, CALIFORNIA 91101-3083
TELEPHONE: (310) 441-3781 (310) 449-2171

CHAIN OF CUSTODY RECORD TO-A1003

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOLE					LABORATORY NAME & ADDRESS: CKY, INC.				
PROJECT NUMBER: 27H10319					630 Maple Ave				
WBS CODE:					Torrance, CA 90503				

SAMPLE NUMBER	COLLECTION		SAMPLER'S INITIALS	NUMBER OF CONTAINERS	CONTAINER SIZE AND TYPE	PRESERVATIVE	NATURE OF SUBSTANCE	ANALYSES REQUESTED	CONDITION ON RECEIPT
	DATE	TIME							
T0-A00000	6/11/86	1340	DD	1	4oz 8oz glass bottle	NONE	MC	SWABBOPLB	
T0-A00001	6/12/86	1200	DD	1	↓	↓	WC	SWABBOPLB	
T0-A00002	6/12/86	1115	DD	1			WC	SWABBOPLB	
T0-A00003	6/12/86	1130	DD	1			WC	SWABBOPLB	
T0-A00004	6/11/86	1340	DD	1			WC	SWABBOPLB; Moisture	
<div style="border: 1px solid black; padding: 10px; transform: rotate(-10deg); display: inline-block;"> Nothing Follows </div>									

COMMENTS: **Composite -20 thru -23. Analyze -24 as a discrete sample. (Comp Group 'C'). Run MS/MSD + Moisture Content on Composite.**

COLLECTED & RELEASED BY: Day/Dual	DATE: 6/11/86	TIME: 1600	TURNAROUND TIME
RECEIVED BY: FED-X	DATE: 6/12/86	TIME: 1600	RELINQUISHED BY
RECORD RETURNED BY	DATE	TIME	SHIPPING NUMBER: 1630795926

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY

LOCATION	SAMPLE NO.	DEPTH	
		BEGIN	END
B659N PCB			
B659N-WP-SR-10			NI
B659N PCB			
B659N-WP-SR-11			NI
B659N PCB			
B659N-WP-SR-12			NI
B659N PCB			
B659N-WP-SR-13			NI
B659N PCB			
B659N-WP-SR-100			ED

SAMPLING COMMENTS: **Split -24 (100). Send split to SPDL. Lot #**



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251 S. L. AVE., PASADENA, CALIFORNIA 91101-3063
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CHAIN OF CUL. BODY RECORD TV-A1004

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY			
LOCATION	SAMPLE DEPTH	DEPTH BEGIN END	CO COC
B659N PCB		0.0	
B659N-WP-B-14		.25	N
B659N PCB		0.0	
B659N-WP-B-15		.25	ALL
B659N PCB		0.0	
B659N-WP-B-14D		.25	FD

SAMPLING COMMENTS: Split - 32 (-14D), Send split to SPDL under separate COC. Lot# 5312022			



JACOB
281 S. LA
TELEPHONE (213) 881-3781 (818) 449-2171

ENGINEERING GROUP INC.

281 S. LA PASADENA, CALIFORNIA 91101-3063

CHAIN OF CUSTODY RECORD TO-A1005

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOELE				LABORATORY NAME & ADDRESS: CKY, Inc.				
PROJECT NUMBER: 27H10319				630 Maple Ave.				
WBS CODE:				Torrance CA 90503				
SAMPLE NUMBER	COLLECTION DATE	TIME	ANALYST INITIALS	NUMBER OF CONTAINERS	CONTAINER SIZE AND TYPE	TEST NAME	ANALYTES REQUESTED	CONDITION ON RECEIPT
TD-A00040	6/8/96	1115	DD	1	4oz glass bottles	NONE CC	SW8080 PCB	
TD-A00041	6/8/96	1100	DD	1	[Large handwritten 'M' spanning rows 41-48]			
TD-A00042	6/8/96	10:30	DD	1				
TD-A00043	6/8/96	1130	DD	1				
TD-A00044	6/8/96	1045	DD	1				
TD-A00045	6/8/96	1145	DD	1				
TD-A00046	6/8/96	1150	DD	1				
TD-A00047	6/8/96	1200	DD	1				
TD-A00048	6/8/96	1210	DD	1				
COMMENTS: Composite Group 'E' includes -40 thru -49. Run ms/msd and moisture content on composite.								
COLLECTED & RELEASED BY: Dayl Buss		DATE: 6/12/96	TIME: 16:00	TURNAROUND TIME				
RECEIVED BY: FED-X		DATE: 6/12/96	TIME: 16:00	RELINQUISHED BY:		DATE: 11	TIME:	
RECORD RETURNED BY:		DATE: 11	TIME:	SHIPPING NUMBER: 9630795926				

INFORMATION IN THIS SECTION
FOR JACOBS USE ONLY

LOCATION	DATE	TIME	DEPT	STATUS
B659N PCB			0.0	
B659N-FP-CC-16			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-17			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-18			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-19			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-20			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-21			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-22			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-23			1.25	N1
B659N PCB			0.0	
B659N-FP-CC-24			1.25	N1

SAMPLING COMMENTS:

Lot # JAN5

5312022



USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY			
LOCATION	SAMPLE DEPTH IN FEET	DEPTH MET 110 BEGIN END	CODE NO
B659NPLB		0.0	
B659N-FP-LL-25		25	NI
B659NPLB		0.0	
B659N-FP-LL-25D		25	PD

SAMPLING COMMENTS: Split -50
(16D). Send split to
SPDL.
Lot.#
5312022



JACO
251 S. L
TELEPHONE (313) 681-3781 (818) 449-2171

ENGINEERING GROUP INC.

AVE., PASADENA, CALIFORNIA 91101-3083

CHAIN OF CUSTODY RECORD TO-A1007

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOELE				LABORATORY NAME & ADDRESS: CKY, INC.			
PROJECT NUMBER: 27H10319				630 Maple Ave.			
WBS CODE:				Torrance, CA 90503			
CANARY NUMBER	DATE	TIME	SAMPLER INITIALS	NUMBER OF CONTAINERS	CONTAINER SIZE AND TYPE	TESTER NAME	ANALYSES REQUESTED
TO-A00070	6/10/96	1445	DD	1	4oz glass bottle	NONE	SW8080 PCB
TO-A00071	6/10/96	1440	DD	1	[Large handwritten 'S' spanning rows 71-78]	[Large handwritten 'S' spanning rows 71-78]	[Large handwritten 'S' spanning rows 71-78]
TO-A00072	6/10/96	1430	DD	1			
TO-A00073	6/10/96	1500	DD	1			
TO-A00074	6/10/96	1505	DD	1			
TO-A00075	6/10/96	1435	DD	1			
TO-A00076	6/10/96	1510	DD	1			
TO-A00077	6/10/96	1055	DD	1			
TO-A00078	6/10/96	1515	DD	1			
COMMENTS: Composite Group 'E' includes -70 thru -79.							
COLLECTED & RELEASED BY: [Signature]		DATE: 6/12/96	TIME: 16:00	TURNAROUND TIME			
RECEIVED BY: FED-X		DATE: 6/12/96	TIME: 16:00	RELINQUISHED BY		DATE: 11	TIME: :
RECORD RETURNED BY		DATE: 11	TIME: :	SHIPPING NUMBER: 9630295930			

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY

LOCATION	DATE	TIME	ANALYSES REQUESTED
B659N PCB			
B659N-FP-CC-26			NI
B659N PCB			
B659N-FP-CC-27			NI
B659N PCB			
B659N-FP-CC-28			NI
B659N PCB			
B659N-FP-CC-29			NI
B659N PCB			
B659N-FP-CC-30			NI
B659N PCB			
B659N-FP-CC-31			NI
B659N PCB			
B659N-FP-CC-32			NI
B659N PCB			
B659N-FP-CC-33			NI
B659N PCB			
B659N-FP-CC-34			NI

SAMPLING COMMENTS:

LOT # 5312022



USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY			
LOCATION	SAMPLE DATE	DEPTH YYS BEGIN END	COMMENTS
B659NPLB		0.0	
B659N-FP-CC-35		25	NI
B659NPLB	290	6.0	91
B659N-FP-CC-35		25	FD
SAMPLING COMMENTS: Split -80 (26D). Send split to SPDL. Lot # 532022			



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251 S. AVE. PASADENA, CALIFORNIA 91101-3083
TELEPHONE: (213) 441-3781 (818) 449-2171

CHAIN OF CUSTODY RECORD TO A1009

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: T00ELE				LABORATORY NAME & ADDRESS: CKY, INC.			
PROJECT NUMBER: 27H10319				630 Maple Ave.			
WBS CODE:				TORRANCE, CA 90503			

SAMPLE NUMBER	COLLECTION DATE	TIME	SAMPLER INITIALS	NUMBER OF CONTAINERS	CONTAINER SIZE AND TYPE	PRESERVE METHOD	DATE	TIME	ANALYSES REQUESTED	CONDITION ON RECEIPT
TD-A00100	6/11/96	0930	DN	1	8oz glass bottle	NONE	CC		SUBSTRATE PCB	
TD-A00101	6/11/96	0956	DN	1	8oz glass bottle					
TD-A00102	6/11/96	1001	DN	1						
TD-A00103	6/11/96	1006	DN	1						
TD-A00104	6/11/96	1010	DN	1						
TD-A00105	6/11/96	1030	DN	1						
TD-A00106	6/11/96	1042	DN	1						
TD-A00107	6/11/96	1048	DN	1						
TD-A00108	6/11/96	1053	DN	1						

COMMENTS: Composite Group 'S' includes -100 thru -109. Run MS/MSD on GOM and Moisture Content on Composite.

COLLECTED & RELEASED BY: Don't Deal	DATE: 6/12/96	TIME: 1600	TURNAROUND TIME
RECEIVED BY: FED-X	DATE: 6/12/96	TIME: 1600	RELINQUISHED BY
RECORD RETURNED BY			DATE
SHIPPING NUMBER: 9630795930			

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY

LOCATION	DATE	TIME	ANALYSES REQUESTED	CONDITION ON RECEIPT
B659N PCB		0.0		
B659N-FP-CC-36		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-37		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-38		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-39		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-40		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-41		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-42		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-43		.25	NI	
B659N PCB		0.0		
B659N-FP-CC-44		.25	NI	

SAMPLING COMMENTS:

LOT# **5312022**

CHAIN OF CUSTODY RECORD TU-A1010

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOELE				LABORATORY NAME & ADDRESS: CKY, INC.			
PROJECT NUMBER: 27H10315				630 Maple Ave			
WBS CODE:				Torrance, CA 90503			

DATE COLLECTED	TIME COLLECTED	DATE	TIME	ANALYST'S INITIALS	NUMBER OF CONTAINERS	CONTAINER SIZE AND NO.	PRESERVATIVE	STATUS	ANALYSES REQUESTED	CONDITION ON RECEIPT
6/11/96	1027	00	1		1	502 8oz glass bottle	NONE	CC	SWB000PCB	
6/11	1036		1		1	8oz		CC	SWB000PCB; Moisture	
<i>Nothing Follows</i>										

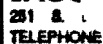
COMMENTS: **-109 is part of Composite Group 'G'. Analyze -110 as a discrete sample.**

COLLECTED & RELEASED BY: Day Quail	DATE: 6/12/96	TIME: 10:00	TURNAROUND TIME
RECEIVED BY: FED-X	DATE: 6/12/96	TIME: 16:00	RELINQUISHED BY
RECORD RETURNED BY	DATE	TIME	
	1/1		
SHIPPING NUMBER: 9630795930			

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY

LOCATION	SAMPLE TYPE	DATE BEGIN	DATE END	STATUS
B659NPLB		---	---	
B659N-EP-CC-45		---	---	NI
B659NPLB	440	---	---	FDI
B659N-EP-CC-250		---	---	
		---	---	
		---	---	
		---	---	
		---	---	
		---	---	
		---	---	
		---	---	
		---	---	
		---	---	
		---	---	

SAMPLING COMMENTS: **Split -110 (360). Send split to SPDL.**
Lot # 5312022



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USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

[illegible]



USE A BALL POINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY			
LOCATION	SAMPLE SIZE	TEST ITEM BEGIN END	DO COUNT
FIELD QL 12 061296 EPI	WQ	----	EPI
FIELD QL 061296	WQ	----	AL

SAMPLING COMMENTS:

LOT # 6108082

CHAIN OF CUSTODY RECORD TD-A1020

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

[illegible]

**INFORMATION IN THIS SECTION
FOR JACOBS USE ONLY**

LOCATION	DATE TIME	DEPTH (ft) BEGIN END	CORRECTION (ft)
FIELDQC 061096 EB1		---	EB

SAMPLING COMMENTS:

LOT# G108082

CHAIN OF CUSTODY RECORD TO-A1013

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOELE				LABORATORY NAME & ADDRESS: SPDL			
PROJECT NUMBER: 27H10319				25 Liberty Ship Way			
WBS CODE:				Sausalito, CA 94965			

LOVE	DATE	TIME	ANALYSES REQUESTED	CONDITION ON RECEIPT
TO-A10060	6/11/96	1324	DD 1	SWB080PCB; Moisture
TO-A10061	6/14/96	1340	DD 1	
Do Not Follow				

COMMENTS:

COLLECTED & RELEASED BY: Day/1/96	DATE: 6/12/96	TIME: 16:00	TURNAROUND TIME
RECEIVED BY: FED-X	DATE: 6/12/96	TIME: 16:00	RELINQUISHED BY
RECORD RETURNED BY:		DATE: 1/1	TIME:
		SHIPPING NUMBER: 9630795911	

INFORMATION IN THIS SECTION FOR JACOBS USE ONLY

LOCATION	DATE	TIME	ANALYSES REQUESTED	CONDITION ON RECEIPT
B659NPCB			DD	
B659N-WP-SR-01DD			DD	
B659NPCB			DD	
B659N-WP-SR-10DD			DD	

SAMPLING COMMENTS:

LOT # 5312022



JAC

ENGINEERING GROUP INC.

251 S. LAY AVE. PARADISE, CALIFORNIA 91101-3063

TELEPHONE (916) 448-3781 (916) 448-2171

CHAIN OF CUSTODY RECORD TO-A1914

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOELE										LABORATORY NAME & ADDRESS: SPDL										
PROJECT NUMBER: 27H10319										25 Liberty Ship Way										
WBS CODE:										Sausalito, CA 94965										
DATE	TIME	LOCATION	ANALYST	ANALYSIS REQUESTED	CONDITION ON RECEIPT															
TO-A0070	6/1/96	BSS	PO	1	802	802	802	802	802	802	802	802	802	802	802	802	802	802	802	802
TO-A0071	6/4/96	1115	PO	1	802	802	802	802	802	802	802	802	802	802	802	802	802	802	802	
COMMENTS: COLLECTED & RELEASED BY: Dayt RECEIVED BY: FED-X RECORD RETURNED BY: 1 SHIPPING NUMBER: 9630795941																				

INFORMATION IN THIS SECTION
FOR JACOBS USE ONLY

LOCATION	DATE	TIME	ANALYST	ANALYSIS REQUESTED	CONDITION ON RECEIPT	DATE	TIME	ANALYST	ANALYSIS REQUESTED	CONDITION ON RECEIPT
B659NPCB						00				
B659N-WP-BG-1400						25				FD
B659NPCB						00				
B659N-FP-CC-1600						25				FD
25 DD										
1/12/96										
SAMPLING COMMENTS: LOT # 5312022										



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CHAIN OF CUSTODY RECORD TO-A1015

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOELE				LABORATORY NAME & ADDRESS: SPDL			
PROJECT NUMBER: 27H10319				25 Liberty Ship Way			
WBS CODE:				Sausalito, CA 94965			
DATE COLLECTED	TIME COLLECTED	LOCATION	DEPTH	ANALYST REQUESTED	CONDITION ON RECEIPT		
6/10/96	1415	DPB	1	2802 glass bottle	NONE	CC	SW20080 PCB; Moisture
6/11/96	0930	DPB	1	2802		CC	
Not All Follows							
COMMENTS:							
COLLECTED & RELEASED BY: <i>[Signature]</i>		DATE: 6/12/96	TIME: 16:00	TURNAROUND TIME			
RECEIVED BY: <i>[Signature]</i>		DATE: 6/12/96	TIME: 16:00	RELINQUISHED BY			
RECORD RETURNED BY		DATE	TIME				
				SHIPPING NUMBER: 963075941			

INFORMATION IN THIS SECTION
FOR JACOBS USE ONLY

LOCATION	DATE	DEPTH	ANALYST
B659N PCB	29 DD US	0.0	
B659N-FP-CC-2400	1-12-96	.25	FD
B659N PCB		0.0	
B659N-FP-CC-3400		.25	FD
44 DD US		----	
1-12-96		----	

SAMPLING COMMENTS:

Lot # 5/12022

ATTACHMENT FIVE

Schaleger, Larry

From: Schaleger, Larry
To: 'jesparza'; 'D. Elskamp'; 'M. Mackenzie'; 'Les Schmittner'; Kushins, Joel; Sextro, Robert; Nuss, Linda; Pomatto, Christina; Busch, Dayton; Zike, Bruce; Christensen, Doug; Duerr, Del
Subject: Preparatory phase meeting, Tooele B659 PCB analysis
Date: Monday, June 03, 1996 4:29PM

1. Attendees (conference call): Kam Pang and Kennette Pimentel, CKY, Torrance, CA (contract laboratory); John Esparza, Sacramento Army Corps of Engineers; and Larry Schaleger, JEG-Sacramento.
2. Project Objectives -- closure criteria of 25 mg/kg (solids) and 10 ug/100 cm sq (filter paper wipes) for PCBs. Compositing scheme requires detection limits of 0.1 mg/kg in the case of solids. CKY affirmed that these DLs could be met, assuming absence of severe matrix effects.
3. Project Organization re: PCB analysis:
CKY: Kennette, lab project manager; Kevin Hoang, lab QC manager; Kam Pang, lab director. JEG-Tooele: Dayton Busch, field tech; Beth Pomatto, field supervisor.
JEG-Sacto: Larry Schaleger, proj chemist; Linda Nuss, sr chemist; Bob Sextro, QA
4. QAPP Review
 - a. Sample preparation: Lab has detailed compositing protocol. Sample size (weight) should be sufficient for all tests. Concrete chips will be subsampled, reduced to <10 mesh, split into two portions, one to be composited, one to be reserved for discrete analysis if necessary. Ditto for other matrices (wood, plasterboard, brick). Compositing instructions to be included on COCs.
 - b. Extractions--soxhlet, 10 g samples, final volume 5 mL. Wipes will be diluted to 10 mL in hexane.
 - c. Required detection limits reviewed. Lowest calibration standard, 50 ug/kg (solid equivalent).
 - d. Required QC: Understood except that default acceptance limits for MS/MSD recovery from solids will be lowered to 50-150% from 65-135% based on lab experience with soils. No basis for telling what they should be from concrete, other odd matrices so actual recoveries will be monitored for evidence of matrix effects. Default MS/MSD RPD raised from 20% to 50% for similar reasons. Spiking levels set at 0.5 ppm or lower.
5. Reporting Results
At least one data package or 10% of samples will be complete (include all raw data).
6. Administrative: containers have been received in the field (field confirmation).
7. Other: Standard requirement re: SDG to include same-day samples only is waived.
Initial (kickoff) meeting to be held when first samples are received, LS to be included.

ATTACHMENT SIX

LABORATORY PCB COMPOSITING PROTOCOL

Approximately 30 concrete chip samples, 15 wood chip samples and 10 filter paper wipe samples will be collected. Three additional concrete chip samples and one or two wood chip samples will be submitted as field duplicates. One solvent-moistened filter paper sample will be submitted as a field blank. Equipment rinsates (aqueous) will accompany the samples. The concrete chip samples are to be composited as are the wood samples.

The action levels for cleanup are 25 mg/kg (ppm) for solids and 10 ug for the filter paper wipe samples. (If these criteria are corrected to account for a 1-in-200 probability of false positive results, then working action levels of 35 ppm and 14 ug, respectively, may be calculated). The detection limit goals are as follows:

$$(0.1) \times [\text{Action level}] / [\text{\#samples in the composite}] = \text{Detection Limit}$$

For example, for a cement composite consisting of 10 samples, the detection limit goal is

$$(0.1) \times (25) / (10) = 0.25 \text{ ppm.}$$

The laboratory will be required to run a detection limit verification standard by analyzing a cement sample spiked with a representative PCB at a level of approximately 0.2-0.5 ppm in order to confirm the required sensitivity. Note that if the composite of ten samples is found to contain 2.5 ppm of PCBs, no individual sample can contain more than 25 ppm. If no PCBs are detected in the composite, no individual sample can contain more than $10 \times 0.25 = 2.5$ ppm of contaminant.

Following the guidance of EPA-560/5-85-026, August, 1985, "Verification of PCB Spill Cleanup by Sampling and Analysis", the concrete (30 count) and wood (15 count) samples will be combined into three composite cement samples consisting of 10 individual samples each and three composite wood samples consisting of four, five and six samples each.

Laboratory Processing Outline. The following scheme will be followed by the laboratory for the preparation and analysis of cement core and wood chip samples:

1. Receive approximately 50 concrete (CT) and wood (WD) chip samples. Each sample will be pre-designated as to which composite group it belongs, e.g., CT-A, -B and -C and WD-D, -E, and -F. The field duplicates will be identified.
2. Pulverize or comminute each sample to pass a 10-mesh screen. (Discard rocks and pebbles).
3. Divide each pulverized sample into two homogeneous subsamples of approximately equal weights. One part will be composited; the other part will be reserved for individual extraction and analysis, if required. The field duplicate samples will not be composited.
4. Combine equal weights of subsamples into their designated composites. Homogenize each of the composites by physical means.
5. Select one of the three cement and one of the three wood composites for spiking as MS/MSD pairs.
6. Prepare samples for analysis using Soxhlet extraction. The samples to be extracted include six composites, two spiked composites, two duplicate spiked composites, individual field duplicates as indicated on the chain-of-custody and, if necessary, 45-50 additional individual samples. (The individual samples will be extracted if necessary to assure that extraction holding times will have been met, should subsequent analysis be needed).
7. Analyze the six composite extracts and the two MS/MSD pairs for PCBs by method SW8081.
8. Analyze the ten wipe samples and one field blank wipe for PCBs.
9. Report all results to Jacobs and await instructions regarding the need to analyze individual samples. Each field duplicate and the individual sample with which it is paired will be analyzed only if specifically requested by Jacobs.
10. Each prep batch will be accompanied by a laboratory control standard (blank spike, BS).

Supplementary Sampling Instructions -- PCBs

1. Field duplicates/QA Splits.

Minimum: 10% per matrix

Example: sample #7 goes to laboratory (CKY) with instructions to halve the sample, composite one half and reserve the other half. Sample #7D, the collocated field duplicate, gets chipped and split (halved) in the field; half goes as a separate sample to CKY and half gets sent to SPDL in Sausalito.

2. Equipment rinsates: 1/day

3. Ambient (DI water) blank: 1/lot #

4. Matrix spike/matrix spike duplicates:

Minimum of one pair/matrix/20 samples

Samples to be composited: lab will be instructed to run MS/MSD on the designated composite

5. ~~Filter paper blank, one only, moistened with hexane, bottled and sent to CKY as a discrete sample.~~

Cancel

Attachment 3
Raw Data and Laboratory Reports



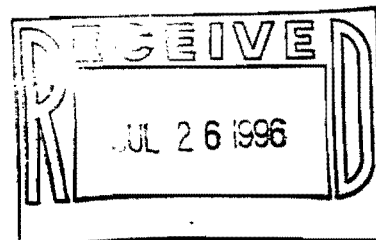
ORIGINAL

CKY incorporated
Analytical Laboratories

Date: 07-23-1996
CKY Batch No.: 96F041

Attn: Nora White

Jacobs Engineering Group
2525 Natomas Park Dr., Ste. 370
Sacramento CA 95833



Subject: Additional Laboratory Report
Project: Tooele / 27H10319

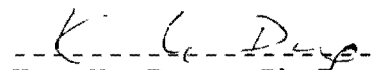
Enclosed is the additional laboratory report for samples received on 06/13/96. The samples were received in coolers with ice and intact; the chain-of-custody forms were properly filled out. The data reported include :

Sample ID	Control No.	Matrix	Analysis
TO-A00020	F041-11	WC	EPA 8080 (PCBs)
TO-A00049	F041-28	CC	EPA 8080 (PCBs)
TO-A00073	F041-33	CC	EPA 8080 (PCBs)
TO-A00108	F041-49	CC	EPA 8080 (PCBs)

The results are summarized on the following pages.

Please feel free to call if you have any questions concerning these results.

Sincerely yours,


Kam Y. Pang, Ph.D.
Laboratory Director

P.S. - All analyses requested for the above referenced project have been completed. Therefore, unless instructed, the remaining portions of the samples will be disposed after fifteen (15) days from the date of this report.

Lab Sample ID	Composite	Moisture
96F041- 1	96F041-CA	MC
96F041- 2	96F041-CA	MC
96F041- 3	96F041-CA	MC
96F041- 4	96F041-CA	MC
96F041- 5	96F041-CA	MC
96F041- 6		MC
96F041- 7	96F041-CB	
96F041- 8	96F041-CB	
96F041- 9	96F041-CB	
96F041- 10	96F041-CB	✓
96F041- 11	96F041-CC	✓
96F041- 12	96F041-CC	✓
96F041- 13	96F041-CC	✓
96F041- 14	96F041-CC	✓
96F041- 15		MC
96F041- 16	96F041-CD	MC
96F041- 17	96F041-CD	MC
96F041- 18	96F041-CD	
96F041- 19	96F041-CE	✓
96F041- 20	96F041-CE	✓
96F041- 21	96F041-CE	✓
96F041- 22	96F041-CE	✓
96F041- 23	96F041-CE	✓
96F041- 24	96F041-CE	✓
96F041- 25	96F041-CE	✓
96F041- 26	96F041-CE	✓
96F041- 27	96F041-CE	✓
96F041- 28	96F041-CE	✓
96F041- 29		MC
96F041- 30	96F041-CF	✓
96F041- 31	96F041-CF	✓
96F041- 32	96F041-CF	✓
96F041- 33	96F041-CF	✓
96F041- 34	96F041-CF	✓
96F041- 35	96F041-CF	✓
96F041- 36	96F041-CF	✓
96F041- 37	96F041-CF	✓
96F041- 38	96F041-CF	✓
96F041- 39	96F041-CF	✓
96F041- 40		MC

Lab Sample ID	Composite	Moisture
96F041- 41	96F041-CG	✓
96F041- 42	96F041-CG	✓
96F041- 43	96F041-CG	✓
96F041- 44	96F041-CG	✓
96F041- 45	96F041-CG	✓
96F041- 46	96F041-CG	✓
96F041- 47	96F041-CG	✓
96F041- 48	96F041-CG	✓
96F041- 49	96F041-CG	✓
96F041- 50	96F041-CG	✓
96F041- 51		MC
96F041- 52		
96F041- 53		
96F041- 54		
96F041- 55		
96F041- 56		
96F041- CA		MC
96F041- CAM		
96F041- CAS		
96F041- CB		MC
96F041- CC		MC
96F041- CCM		
96F041- CCS		
96F041- CD		MC
96F041- CDM		
96F041- CDS		
96F041- CE		MC
96F041- CEM		
96F041- CES		
96F041- CF		MC
96F041- CG		MC
96F041- CGM		
96F041- CGS		

SAMPLE HANDLING AND PREPARATION

- 1 Individually crush all samples using the drop hammer.
Make sure that the steel mold is free from contamination before using it and every after working on each sample.
- 2 Split the samples that requires grouping (refer to table).
1 part is returned to the original container
1 part goes to the composite jar
- 3 Analyze moisture only on the samples indicated in the table
- 4 Extract samples by Method 3540 (Soxhlet Extraction)
- 5 Group extraction as follows:
96F041- CA, CB, CD, CE, CF, CG, 6, 15, 29, 40, 51
96F041- 1 to 5, 7 to 14, 10 to 14, 19 to 28
96F041- 16 to 28, 30 to 39, 41 to 50
96F041- 30 to 39, 41 to 50
- 6 Prepare Blank and LCS for every batch.
- 7 Perform MS/MSD on the following samples
96F041-CA 96F041-CC 96F041-CD 96F041-CE 96F041-CG

SAMPLE LOGIN

Refer sample login from the table.
Each sample shall be logged in as well as the composite samples. Client sample ID shall be logged as "COMP-GROUP-X"

EPA METHOD 3520/8080
PCB'S

```

=====
CLIENT:      Jacobs Engineering Group    DATE COLLECTED: 08/12/96
PROJECT:     Toole Ammunition/ 27-H103-19 DATE RECEIVED:  08/15/96
BATCH NO.:   96H058                     DATE EXTRACTED: 08/17/96
SAMPLE ID:    PCB-1                     DATE ANALYZED:  08/21/96
CONTROL NO.: H058-01                     MATRIX:         WATER
% MOISTURE:   NA                         DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	42	50-150
Decachlorobiphenyl	18*	50-150

```

=====
RL:  Reporting Limit
* :  Out of QC limits

```

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group    DATE COLLECTED: 06/11/96
PROJECT:     Toole / 27H10319           DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                    DATE EXTRACTED: 06/22/96
SAMPLE ID:    TO-A00020                 DATE ANALYZED:  06/26/96
CONTROL NO.:  F041-11                   MATRIX:         WC
% MOISTURE:   NA                        DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	234	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	91	50-150
Decachlorobiphenyl	87	50-150

RL: Reporting Limit

003

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/08/96
PROJECT:     Toole / 27H10319              DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/22/96
SAMPLE ID:    TO-A00049                    DATE ANALYZED:  06/26/96
CONTROL NO.:  F041-28                      MATRIX:         CC
% MOISTURE:   NA                          DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	83	50-150
Decachlorobiphenyl	30*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

004

42

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group    DATE COLLECTED: 06/10/96
PROJECT:     Toole / 27H10319           DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                    DATE EXTRACTED: 06/24/96
SAMPLE ID:   TO-A000073                DATE ANALYZED:  06/27/96
CONTROL NO.: F041-33                   MATRIX:         CC
% MOISTURE:  NA                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	2590	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	96	50-150
Decachlorobiphenyl	52	50-150

RL: Reporting Limit

005

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/10/96
PROJECT:     Toole / 27H10319              DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/24/96
SAMPLE ID:   TO-A00073                    DATE ANALYZED:  07/01/96
CONTROL NO.: F041-33T                     MATRIX:         CC
% MOISTURE:  NA                           DILUTION FACTOR: 5
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	250
Aroclor-1221	ND	250
Aroclor-1232	ND	250
Aroclor-1242	ND	250
Aroclor-1248	ND	250
Aroclor-1254	ND	250
Aroclor-1260	ND	250

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	140	50-150
Decachlorobiphenyl	78	50-150

RL: Reporting Limit

006

CKY

144

EPA METHOD 3540/8080
PCB's

```

=====
CLIENT:      Jacobs Engineering Group    DATE COLLECTED: 06/11/96
PROJECT:     Toole / 27H10319           DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                     DATE EXTRACTED: 06/24/96
SAMPLE ID:   TO-A00108                  DATE ANALYZED:  06/27/96
CONTROL NO.: F041-49                     MATRIX:         CC
% MOISTURE:  NA                           DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	86	50-150
Decachlorobiphenyl	23*	50-150

```

=====
RL:  Reporting Limit
* :  Out of QC limit

```

EPA METHOD 3540/8080
PCB'S

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED:  NA
PROJECT:     Toole / 27H10319              DATE RECEIVED:   NA
BATCH NO.:   96F041                       DATE EXTRACTED:  06/22/96
SAMPLE ID:    MBLK1S                       DATE ANALYZED:   06/26/96
CONTROL NO.:  CPF019SB                     MATRIX:         WC
% MOISTURE:   NA                           DILUTION FACTOR: 1
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	117	50-150
Decachlorobiphenyl	98	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group    DATE COLLECTED:  NA
PROJECT:     Toole / 27H10319           DATE RECEIVED:   NA
BATCH NO.:   96F041                     DATE EXTRACTED:  06/22/96
SAMPLE ID:   MBLK2S                     DATE ANALYZED:   06/26/96
CONTROL NO.: CPF020SB                   MATRIX:          WC
% MOISTURE:  NA                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	97	50-150
Decachlorobiphenyl	99	50-150

RL: Reporting Limit

CKY QUALITY CONTROL DATA
LCS/LCD ANALYSIS

CLIENT: Jacobs Engineering Group
 PROJECT: Toole / 27H10319
 LOCATION: EPA 3540/8080
 MATRIX: WC
 % MOISTURE: NA

BATCH NO.: 96F041
 SAMPLE ID: LCS1S/LCS1SD
 CONTROL NO.: CPF019SL/C

DATE RECEIVED: NA
 DATE EXTRACTED: 06/22/96
 DATE ANALYZED: 06/26/96

ACCESSION: 96F041

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	250.00	265.00	106	250.00	272.00	109	3	50-150	50

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	QC LIMIT %
Tetrachloro-m-xylene	40.00	41.80	104	40.00	46.30	116	50-150
Decachlorobiphenyl	40.00	40.80	102	40.00	41.10	103	50-150

010

CKY

CKY QUALITY CONTROL DATA
LCS/LCD ANALYSIS

CLIENT: Jacobs Engineering Group
 ECT: Toole / 27H10319
 DD: EPA 3540/8080
 MATRIX: WC
 % MOISTURE: NA

BATCH NO.: 96F041
 SAMPLE ID: LCS2S/LCS2SD
 CONTROL NO.: CPF020SL/C

DATE RECEIVED: NA
 DATE EXTRACTED: 06/22/96
 DATE ANALYZED: 06/26/96

ACCESSION: 96F041

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	250.00	248.00	99	250.00	262.00	105	5	50-150	50

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	QC LIMIT %
Tetrachloro-m-xylene	40.00	38.30	96	40.00	36.70	92	50-150
Decachlorobiphenyl	40.00	40.00	100	40.00	41.00	102	50-150

011

(45)

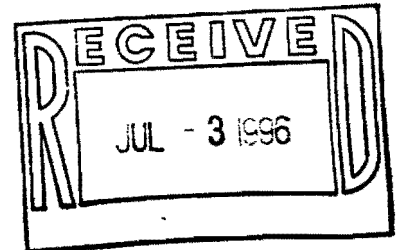




CKY incorporated Analytical Laboratories

Date: 06-29-1996
CKY Batch No.: 96F041

ORIGINAL



Attn: Nora White

Jacobs Engineering Group
2525 Natomas Park Dr., Ste. 370
Sacramento CA 95833

Subject: Laboratory Report
Project: Tooele / 27H10319

Enclosed is the Laboratory report for samples received on 06/13/96. The samples were received in coolers with ice and intact; the chain-of-custody forms were properly filled out. The data reported include :

Sample ID	Control No.	Matrix	Analysis
TO-A00001	F041-01	WC	EPA 8080 (PCBs)
TO-A00002	F041-02	WC	EPA 8080 (PCBs)
TO-A00003	F041-03	WC	EPA 8080 (PCBs)
TO-A00004	F041-04	WC	EPA 8080 (PCBs)
TO-A00005	F041-05	WC	EPA 8080 (PCBs)
TO-A00006	F041-06	WC	EPA 8080 (PCBs)
TO-A00010	F041-07	WC	EPA 8080 (PCBs)
TO-A00011	F041-08	WC	EPA 8080 (PCBs)
TO-A00012	F041-09	WC	EPA 8080 (PCBs)
TO-A00013	F041-10	WC	EPA 8080 (PCBs)
TO-A00020	F041-11	WC	EPA 8080 (PCBs)
TO-A00021	F041-12	WC	EPA 8080 (PCBs)
TO-A00022	F041-13	WC	EPA 8080 (PCBs)
TO-A00023	F041-14	WC	EPA 8080 (PCBs)
TO-A00024	F041-15	WC	EPA 8080 (PCBs)
TO-A00030	F041-16	BC	EPA 8080 (PCBs)
TO-A00031	F041-17	BC	EPA 8080 (PCBs)
TO-A00032	F041-18	BC	EPA 8080 (PCBs)
TO-A00040	F041-19	CC	EPA 8080 (PCBs)
TO-A00041	F041-20	CC	EPA 8080 (PCBs)
TO-A00042	F041-21	CC	EPA 8080 (PCBs)
TO-A00043	F041-22	CC	EPA 8080 (PCBs)
TO-A00044	F041-23	CC	EPA 8080 (PCBs)
TO-A00045	F041-24	CC	EPA 8080 (PCBs)
TO-A00046	F041-25	CC	EPA 8080 (PCBs)
TO-A00047	F041-26	CC	EPA 8080 (PCBs)
TO-A00048	F041-27	CC	EPA 8080 (PCBs)
TO-A00049	F041-28	CC	EPA 8080 (PCBs)
TO-A00050	F041-29	CC	EPA 8080 (PCBs)
TO-A00070	F041-30	CC	EPA 8080 (PCBs)
TO-A00071	F041-31	CC	EPA 8080 (PCBs)
TO-A00072	F041-32	CC	EPA 8080 (PCBs)

Sample ID	Control No.	Matrix	Analysis
TO-A00073	F041-33	CC	EPA 8080 (PCBs)
TO-A00074	F041-34	CC	EPA 8080 (PCBs)
TO-A00075	F041-35	CC	EPA 8080 (PCBs)
TO-A00076	F041-36	CC	EPA 8080 (PCBs)
TO-A00077	F041-37	CC	EPA 8080 (PCBs)
TO-A00078	F041-38	CC	EPA 8080 (PCBs)
TO-A00079	F041-39	CC	EPA 8080 (PCBs)
TO-A00080	F041-40	CC	EPA 8080 (PCBs)
TO-A00100	F041-41	CC	EPA 8080 (PCBs)
TO-A00101	F041-42	CC	EPA 8080 (PCBs)
TO-A00102	F041-43	CC	EPA 8080 (PCBs)
TO-A00103	F041-44	CC	EPA 8080 (PCBs)
TO-A00104	F041-45	CC	EPA 8080 (PCBs)
TO-A00105	F041-46	CC	EPA 8080 (PCBs)
TO-A00106	F041-47	CC	EPA 8080 (PCBs)
TO-A00107	F041-48	CC	EPA 8080 (PCBs)
TO-A00108	F041-49	CC	EPA 8080 (PCBs)
TO-A00109	F041-50	CC	EPA 8080 (PCBs)
TO-A00110	F041-51	CC	EPA 8080 (PCBs)
TO-A00200	F041-52	Water	EPA 8080 (PCBs)
TO-A00210	F041-53	Water	EPA 8080 (PCBs)
TO-A00211	F041-54	Water	EPA 8080 (PCBs)
TO-A00220	F041-55	Water	EPA 8080 (PCBs)
TO-A00230	F041-56	Water	EPA 8080 (PCBs)
COMP-GROUP-A	F041-CA	WC	EPA 8080 (PCBs)
COMP-GROUP-AMS	F041-CAM	WC	EPA 8080 (PCBs)
COMP-GROUP-AMS	F041-CAS	WC	EPA 8080 (PCBs)
COMP-GROUP-B	F041-CB	WC	EPA 8080 (PCBs)
COMP-GROUP-C	F041-CC	WC	EPA 8080 (PCBs)
COMP-GROUP-CMS	F041-CCM	WC	EPA 8080 (PCBs)
COMP-GROUP-CMS	F041-CCS	WC	EPA 8080 (PCBs)
COMP-GROUP-D	F041-CD	BC	EPA 8080 (PCBs)
COMP-GROUP-DMS	F041-CDM	BC	EPA 8080 (PCBs)
COMP-GROUP-DMS	F041-CDS	BC	EPA 8080 (PCBs)
COMP-GROUP-E	F041-CE	CC	EPA 8080 (PCBs)
COMP-GROUP-EMS	F041-CEM	CC	EPA 8080 (PCBs)
COMP-GROUP-EMS	F041-CES	CC	EPA 8080 (PCBs)
COMP-GROUP-F	F041-CF	CC	EPA 8080 (PCBs)
COMP-GROUP-G	F041-CG	CC	EPA 8080 (PCBs)
COMP-GROUP-GMS	F041-CGM	CC	EPA 8080 (PCBs)
COMP-GROUP-GMS	F041-CGS	CC	EPA 8080 (PCBs)

The results are summarized on the following pages.

Please feel free to call if you have any questions concerning these results.

Sincerely yours,

K. Y. Pang

Kam Y. Pang, Ph.D.
Laboratory Director

P.S. - All analyses requested for the above referenced project have been completed. Therefore, unless instructed, the remaining portions of the samples will be disposed after fifteen (15) days from the date of this report.

CASE NARRATIVE

CLIENT: JACOBS ENGINEERING
PROJECT: TOOELE/27H10319
SDG: 96F041

PCBs

Fifty-one (51) concrete and wood chip samples and five (5) water samples were received on 06/13/96 to be analyzed for PCBs by EPA 8080^{1/2} accordance with SW846 (3rd Rev. 1994). The solid samples were composited into 8 samples as shown in the attached page.

I. Holding Time

All samples were extracted and analyzed within the holding time except the re-extraction of composite samples F041-CG, F041-GC matrix spike and matrix spike duplicate to verify the matrix effect.

II. Blank

All method blanks were free of contamination.

III. Matrix Spike/Matrix Spike Duplicate

Composite samples F041-CA, F041-CC from wood chips were spiked with Arochlor 1260. Recoveries in F041-CA were within QC limits of 55-145% but RPD was 25% which was out of project specific limit of 20%. The recoveries of F041-CC were 52% and 63% respectively.

Matrix spike recoveries from a composite sample of concrete (F041-CG) had low recoveries in the original extracts. Upon reextraction and reanalysis, recovery of one matrix spike was still out of QC limits.

IV. Lab Control Sample

All results were within the control limits.

V. Surrogate Recovery

Recoveries of TCX in all samples were within QC limits of 50-150% except in the reanalysis of F041-CE, which may be attributed to column interference. Recoveries of DCB in F041-55, F041-29, F041-40, F041-51, F041-CC, F041-CE, F041-CF, F041-CG, F041-CA MS/MSD, F041-CC MS/MSD, F041-CD MS/MSD, F041-CE MS/MSD, F041-CG MS/MSD were outside QC limits. Recoveries of DCB in reanalyses of F041-29, F041-40, F041-51, F041-CC, F041-CF, F041-CG, F041-CGM, F041-CGS and F041-CCS were still out of QC limit.

TEAD, BLG 569 PROJECT

Lab Sample ID	Composite	Moisture
96F041- 1	96F041-CA	MC
96F041- 2	96F041-CA	MC
96F041- 3	96F041-CA	MC
96F041- 4	96F041-CA	MC
96F041- 5	96F041-CA	MC
96F041- 6		MC
96F041- 7	96F041-CB	
96F041- 8	96F041-CB	
96F041- 9	96F041-CB	
96F041- 10	96F041-CB	
96F041- 11	96F041-CC	
96F041- 12	96F041-CC	
96F041- 13	96F041-CC	
96F041- 14	96F041-CC	
96F041- 15		MC
96F041- 16	96F041-CD	MC
96F041- 17	96F041-CD	MC
96F041- 18	96F041-CD	
96F041- 19	96F041-CE	
96F041- 20	96F041-CE	
96F041- 21	96F041-CE	
96F041- 22	96F041-CE	
96F041- 23	96F041-CE	
96F041- 24	96F041-CE	
96F041- 25	96F041-CE	
96F041- 26	96F041-CE	
96F041- 27	96F041-CE	
96F041- 28	96F041-CE	
96F041- 29		MC
96F041- 30	96F041-CF	
96F041- 31	96F041-CF	
96F041- 32	96F041-CF	
96F041- 33	96F041-CF	
96F041- 34	96F041-CF	
96F041- 35	96F041-CF	
96F041- 36	96F041-CF	
96F041- 37	96F041-CF	
96F041- 38	96F041-CF	
96F041- 39	96F041-CF	
96F041- 40		MC

SAMPLE LOGIN

Refer sample login from the table.
Each sample shall be logged in as well as the composite samples. Client sample ID shall be logged as "COMP-GROUP-X"

Lab Sample ID	Composite	Moisture
96F041- 41	96F041-CG	
96F041- 42	96F041-CG	
96F041- 43	96F041-CG	
96F041- 44	96F041-CG	
96F041- 45	96F041-CG	
96F041- 46	96F041-CG	
96F041- 47	96F041-CG	
96F041- 48	96F041-CG	
96F041- 49	96F041-CG	
96F041- 50	96F041-CG	
96F041- 51		MC
96F041- 52		
96F041- 53		
96F041- 54		
96F041- 55		
96F041- 56		
96F041- CA		MC
96F041- CAM		
96F041- CAS		
96F041- CB		MC
96F041- CC		MC
96F041- CCM		
96F041- CCS		
96F041- CD		MC
96F041- CDM		
96F041- CDS		
96F041- CE		MC
96F041- CEM		
96F041- CES		
96F041- CF		MC
96F041- CG		MC
96F041- CGM		
96F041- CGS		

SAMPLE HANDLING AND PREPARATION

- 1 Individually crush all samples using the drop hammer.
Make sure that the steel mold is free from contamination before using it and every after working on each sample.
- 2 Split the samples that requires grouping (refer to table).
1 part is returned to the original container
1 part goes to the composite jar
- 3 Analyze moisture only on the samples indicated in the table
- 4 Extract samples by Method 3540 (Soxhlet Extraction)
- 5 Group extraction as follows:
96F041- CA, CB, CD, CE, CF, CG, 6, 15, 29, 40, 51, CC
96F041- 1 to 5, 7 to 14
96F041- 16 to 28
96F041- 30 to 39, 41 to 50
- 6 Prepare Blank and LCS for every batch.
- 7 Perform MS/MSD on the following samples
96F041-CA 96F041-CC 96F041-CD 96F041-CE 96F041-CG

EPA METHOD 3520/8080
PCB'S

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/08/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00200                   DATE ANALYZED:  06/19/96
CONTROL NO.: F041-52                     MATRIX:         WATER
% MOISTURE:  NA                          DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	68	50-150
Decachlorobiphenyl	60	50-150

RL: Reporting Limit

EPA METHOD 3520/8080
PCB'S

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/12/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00210                   DATE ANALYZED:  06/19/96
CONTROL NO.: F041-53                     MATRIX:         WATER
% MOISTURE:  NA                           DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	80	50-150
Decachlorobiphenyl	73	50-150

RL: Reporting Limit

EPA METHOD 3520/8080
PCB'S

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/12/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00211                    DATE ANALYZED:  06/20/96
CONTROL NO.: F041-54                      MATRIX:         WATER
% MOISTURE:  NA                           DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	79	50-150
Decachlorobiphenyl	66	50-150

RL: Reporting Limit

EPA METHOD 3520/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319             DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/14/96
SAMPLE ID:    TO-A00220                    DATE ANALYZED:  06/20/96
CONTROL NO.:  F041-55                     MATRIX:         WATER
% MOISTURE:   NA                          DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	81	50-150
Decachlorobiphenyl	41*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

EPA METHOD 3520/8080
PCB'S

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/10/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00230                   DATE ANALYZED:  06/20/96
CONTROL NO.: F041-56                     MATRIX:         WATER
% MOISTURE:  NA                          DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	81	50-150
Decachlorobiphenyl	65	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00006                   DATE ANALYZED:  06/25/96
CONTROL NO.: F041-06                     MATRIX:         WC
% MOISTURE:  8.3                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	54.5
Aroclor-1221	ND	54.5
Aroclor-1232	ND	54.5
Aroclor-1242	ND	54.5
Aroclor-1248	ND	54.5
Aroclor-1254	ND	54.5
Aroclor-1260	ND	54.5

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	85	50-150
Decachlorobiphenyl	83	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319             DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                        DATE EXTRACTED: 06/14/96
SAMPLE ID:    TO-A00024                     DATE ANALYZED:  06/26/96
CONTROL NO.:  F041-15                       MATRIX:         WC
% MOISTURE:   6.5                           DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	53.5
Aroclor-1221	ND	53.5
Aroclor-1232	ND	53.5
Aroclor-1242	ND	53.5
Aroclor-1248	ND	53.5
Aroclor-1254	ND	53.5
Aroclor-1260	120	53.5

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	82	50-150
Decachlorobiphenyl	107	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB's

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/08/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00050                   DATE ANALYZED:  06/20/96
CONTROL NO.: F041-29                     MATRIX:         CC
% MOISTURE:  1.9                         DILUTION FACTOR: 1
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	51
Aroclor-1221	ND	51
Aroclor-1232	ND	51
Aroclor-1242	ND	51
Aroclor-1248	ND	51
Aroclor-1254	ND	51
Aroclor-1260	ND	51

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	72	50-150
Decachlorobiphenyl	18*	50-150

```

=====
RL:  Reporting Limit
* :  Out of QC limit
  
```

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/08/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00050                   DATE ANALYZED:  06/26/96
CONTROL NO.: F041-29R                    MATRIX:        CC
% MOISTURE:  1.9                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	51
Aroclor-1221	ND	51
Aroclor-1232	ND	51
Aroclor-1242	ND	51
Aroclor-1248	ND	51
Aroclor-1254	ND	51
Aroclor-1260	ND	51

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	76	50-150
Decachlorobiphenyl	28*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

EPA METHOD 3540/8080
PCB's

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/10/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00080                   DATE ANALYZED:  06/20/96
CONTROL NO.: F041-40                     MATRIX:         CC
% MOISTURE:  1.7                         DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.9
Aroclor-1221	ND	50.9
Aroclor-1232	ND	50.9
Aroclor-1242	ND	50.9
Aroclor-1248	ND	50.9
Aroclor-1254	ND	50.9
Aroclor-1260	290	50.9

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	78	50-150
Decachlorobiphenyl	29*	50-150

```

=====
RL:  Reporting Limit
* :  Out of QC limit

```

EPA METHOD 3540/8080
PCB's

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/10/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   TO-A00080                   DATE ANALYZED:  06/26/96
CONTROL NO.: F041-40R                     MATRIX:         CC
% MOISTURE:  1.7                         DILUTION FACTOR: 1
=====
  
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.9
Aroclor-1221	ND	50.9
Aroclor-1232	ND	50.9
Aroclor-1242	ND	50.9
Aroclor-1248	ND	50.9
Aroclor-1254	ND	50.9
Aroclor-1260	300	50.9

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	87	50-150
Decachlorobiphenyl	43*	50-150

```

=====
RL:  Reporting Limit
* :  Out of QC limit
  
```

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:      Tooele / 27H10319           DATE RECEIVED:  06/13/96
BATCH NO.:    96F041                     DATE EXTRACTED: 06/14/96
SAMPLE ID:    TO-A00110                  DATE ANALYZED:  06/20/96
CONTROL NO.:  F041-51                   MATRIX:         CC
% MOISTURE:    1.5                      DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.8
Aroclor-1221	ND	50.8
Aroclor-1232	ND	50.8
Aroclor-1242	ND	50.8
Aroclor-1248	ND	50.8
Aroclor-1254	ND	50.8
Aroclor-1260	64	50.8

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	70	50-150
Decachlorobiphenyl	19*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group    DATE COLLECTED: 06/12/96
PROJECT:     Tooele / 27H10319          DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                     DATE EXTRACTED: 06/14/96
SAMPLE ID:   COMP-GROUP-A               DATE ANALYZED:  06/25/96
CONTROL NO.: F041-CA                     MATRIX:         WC
% MOISTURE:  7.3                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	53.9
Aroclor-1221	ND	53.9
Aroclor-1232	ND	53.9
Aroclor-1242	ND	53.9
Aroclor-1248	ND	53.9
Aroclor-1254	ND	53.9
Aroclor-1260	ND	53.9

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	85	50-150
Decachlorobiphenyl	50	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/12/96
PROJECT:     Tooele / 27H10319             DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                        DATE EXTRACTED: 06/14/96
SAMPLE ID:   COMP-GROUP-B                 DATE ANALYZED:  06/25/96
CONTROL NO.: F041-CB                      MATRIX:         WC
% MOISTURE:  6.3                          DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	53.4
Aroclor-1221	ND	53.4
Aroclor-1232	ND	53.4
Aroclor-1242	ND	53.4
Aroclor-1248	ND	53.4
Aroclor-1254	ND	53.4
Aroclor-1260	ND	53.4
SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	77	50-150
Decachlorobiphenyl	79	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/12/96
PROJECT:     Tooele / 27H10319             DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/14/96
SAMPLE ID:    COMP-GROUP-C                 DATE ANALYZED:  06/20/96
CONTROL NO.:  F041-CC                     MATRIX:         WC
% MOISTURE:   6.9                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	170	53.7
Aroclor-1221	ND	53.7
Aroclor-1232	ND	53.7
Aroclor-1242	ND	53.7
Aroclor-1248	ND	53.7
Aroclor-1254	ND	53.7
Aroclor-1260	160	53.7

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	73	50-150
Decachlorobiphenyl	24*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limits
```

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/12/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   COMP-GROUP-D                DATE ANALYZED:  06/25/96
CONTROL NO.: F041-CD                     MATRIX:         BC
% MOISTURE:  0.1                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	84	50-150
Decachlorobiphenyl	81	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB's

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/08/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:   COMP-GROUP-E                DATE ANALYZED:  06/20/96
CONTROL NO.: F041-CE                     MATRIX:         CC
% MOISTURE:  2.5                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	51.3
Aroclor-1221	ND	51.3
Aroclor-1232	ND	51.3
Aroclor-1242	ND	51.3
Aroclor-1248	ND	51.3
Aroclor-1254	360	51.3
Aroclor-1260	ND	51.3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	56	50-150
Decachlorobiphenyl	31*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
=====
```

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EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319             DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/14/96
SAMPLE ID:   COMP-GROUP-F                 DATE ANALYZED:  06/20/96
CONTROL NO.: F041-CF                     MATRIX:         CC
% MOISTURE:  1.5                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.8
Aroclor-1221	ND	50.8
Aroclor-1232	ND	50.8
Aroclor-1242	ND	50.8
Aroclor-1248	ND	50.8
Aroclor-1254	ND	50.8
Aroclor-1260	250	50.8

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	61	50-150
Decachlorobiphenyl	23*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319             DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                       DATE EXTRACTED: 06/14/96
SAMPLE ID:   COMP-GROUP-F                 DATE ANALYZED:  06/25/96
CONTROL NO.: F041-CFR                     MATRIX:         CC
% MOISTURE:  1.5                          DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.8
Aroclor-1221	ND	50.8
Aroclor-1232	ND	50.8
Aroclor-1242	ND	50.8
Aroclor-1248	ND	50.8
Aroclor-1254	ND	50.8
Aroclor-1260	230	50.8

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	63	50-150
Decachlorobiphenyl	42*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/14/96
SAMPLE ID:    COMP-GROUP-G               DATE ANALYZED:  06/20/96
CONTROL NO.:  F041-CG                    MATRIX:         CC
% MOISTURE:   1.4                        DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.7
Aroclor-1221	ND	50.7
Aroclor-1232	ND	50.7
Aroclor-1242	ND	50.7
Aroclor-1248	ND	50.7
Aroclor-1254	ND	50.7
Aroclor-1260	200	50.7

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	61	50-150
Decachlorobiphenyl	24*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
=====
```

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED: 06/11/96
PROJECT:     Tooele / 27H10319            DATE RECEIVED:  06/13/96
BATCH NO.:   96F041                      DATE EXTRACTED: 06/25/96
SAMPLE ID:   COMP-GROUP-G                DATE ANALYZED:  06/27/96
CONTROL NO.: F041-CGR                    MATRIX:        CC
% MOISTURE:  1.4                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50.7
Aroclor-1221	ND	50.7
Aroclor-1232	ND	50.7
Aroclor-1242	ND	50.7
Aroclor-1248	ND	50.7
Aroclor-1254	ND	50.7
Aroclor-1260	220	50.7

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	67	50-150
Decachlorobiphenyl	43*	50-150

```
=====
RL:  Reporting Limit
* :  Out of QC limit
```

EPA METHOD 3520/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED:  NA
PROJECT:     Tooele / 27H10319             DATE RECEIVED:   NA
BATCH NO.:   96F041                       DATE EXTRACTED:  06/14/96
SAMPLE ID:    MBLK1W                      DATE ANALYZED:   06/19/96
CONTROL NO.:  CPF016WB                   MATRIX:         WATER
% MOISTURE:   NA                         DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/L)	RL (ug/L)
Aroclor-1016	ND	3
Aroclor-1221	ND	3
Aroclor-1232	ND	3
Aroclor-1242	ND	3
Aroclor-1248	ND	3
Aroclor-1254	ND	3
Aroclor-1260	ND	3

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	79	50-150
Decachlorobiphenyl	70	50-150

RL: Reporting Limit

141

175

GV

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED:  NA
PROJECT:     Tooele / 27H10319             DATE RECEIVED:   NA
BATCH NO.:   96F041                       DATE EXTRACTED:  06/14/96
SAMPLE ID:    MBLK1S                       DATE ANALYZED:   06/20/96
CONTROL NO.:  CPF015SB                     MATRIX:         WC/CC
% MOISTURE:   NA                           DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	100	50-150
Decachlorobiphenyl	84	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB's

```

=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED:  NA
PROJECT:     Tooele / 27H10319            DATE RECEIVED:   NA
BATCH NO.:   96F041                      DATE EXTRACTED:  06/14/96
SAMPLE ID:    MBLK1SR                     DATE ANALYZED:   06/25/96
CONTROL NO.:  CPF015SBR                   MATRIX:         WC/CC
% MOISTURE:   NA                          DILUTION FACTOR: 1
=====

```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	113	50-150
Decachlorobiphenyl	109	50-150

RL: Reporting Limit

EPA METHOD 3540/8080
PCB'S

```
=====
CLIENT:      Jacobs Engineering Group      DATE COLLECTED:  NA
PROJECT:     Tooele / 27H10319             DATE RECEIVED:   NA
BATCH NO.:   96F041                       DATE EXTRACTED:  06/25/96
SAMPLE ID:    MBLK2S                      DATE ANALYZED:   06/27/96
CONTROL NO.:  CPF021SB                    MATRIX:         CC
% MOISTURE:   NA                          DILUTION FACTOR: 1
=====
```

PARAMETERS	RESULTS (ug/kg)	RL (ug/kg)
Aroclor-1016	ND	50
Aroclor-1221	ND	50
Aroclor-1232	ND	50
Aroclor-1242	ND	50
Aroclor-1248	ND	50
Aroclor-1254	ND	50
Aroclor-1260	ND	50

SURROGATE PARAMETER	% RECOVERY	QC LIMIT
Tetrachloro-m-xylene	99	50-150
Decachlorobiphenyl	96	50-150

RL: Reporting Limit

CKY QUALITY CONTROL DATA
LCS/LCD ANALYSIS

CLIENT: Jacobs Engineering Group
PROJECT: Tooele / 27H10319
METHOD: EPA 3520/8080
MATRIX: WATER
% MOISTURE: NA

BATCH NO.: 96F041
SAMPLE ID: LCS1W/LCS1WD
CONTROL NO.: CPF016WL/C

DATE RECEIVED: NA
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/19/96

ACCESSION: 96F041

PARAMETER	BLNK RSLT (ug/L)	SPIKE AMT (ug/L)	BS RSLT (ug/L)	BS % REC	SPIKE AMT (ug/L)	BSD RSLT (ug/L)	BSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	5.00	5.30	106	5.00	5.30	106	0	50-150	50

SURROGATE PARAMETER	SPIKE AMT (ug/L)	BS RSLT (ug/L)	BS % REC	SPIKE AMT (ug/L)	BSD RSLT (ug/L)	BSD % REC	QC LIMIT %
Tetrachloro-m-xylene	20.00	16.00	80	20.00	15.80	79	50-150
Decachlorobiphenyl	20.00	15.60	78	20.00	15.20	76	50-150

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CKY

CKY QUALITY CONTROL DATA
LCS ANALYSIS

CLIENT: Jacobs Engineering Group
PROJECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: WC/CC
% MOISTURE: NA

BATCH NO.: 96F041
SAMPLE ID: LCS1S
CONTROL NO.: CPF015SL
DATE RECEIVED: NA
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/20/96
ACCESSION: 96F041

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	LCS RSLT (ug/kg)	LCS % REC	QC LIMIT (%)
Aroclor 1260	ND	250.00	258.00	103	50-150

SURROGATE PARAMETER	SPIKE AMOUNT (ug/kg)	LCS RESULT (ug/kg)	LCS % REC	QC LIMIT %
Tetrachloro-m-xylene	40.00	37.40	94	50-150
Decachlorobiphenyl	40.00	35.00	88	50-150

CKY QUALITY CONTROL DATA
LCS/LCD ANALYSIS

IT: Jacobs Engineering Group
ECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: WC/CC
% MOISTURE: NA

BATCH NO.: 96F041
SAMPLE ID: LCS2S/LCS2SD
CONTROL NO.: CPF021SL/C

DATE RECEIVED: NA
DATE EXTRACTED: 06/25/96
DATE ANALYZED: 06/27/96

ACCESSION: 96F041

PARAMETER	BLNK RSLT (ug/kg)	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	250.00	216.00	86	250.00	237.00	95	9	50-150	50

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	BS RSLT (ug/kg)	BS % REC	SPIKE AMT (ug/kg)	BSD RSLT (ug/kg)	BSD % REC	QC LIMIT %
Tetrachloro-m-xylene	40.00	40.50	101	40.00	39.00	98	50-150
Decachlorobiphenyl	40.00	37.60	94	40.00	37.30	93	50-150

CKY QUALITY CONTROL DATA
MS/MSD ANALYSIS

VT: Jacobs Engineering Group
JECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: WC
% MOISTURE: 7.3

BATCH NO.: 96F041
SAMPLE ID: COMP-GROUP-A
CONTROL NO.: F041-CA

DATE RECEIVED: 06/13/96
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/20/96

ACCESSION: 96F041

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	269.00	173.00	64	269.00	222.00	83	25*	55-145	20

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT %
Tetrachloro-m-xylene	43.10	28.80	67	43.10	31.20	72	50-150
Decachlorobiphenyl	43.10	10.60	25*	43.10	11.80	27*	50-150

* Out of QC limit

CKY QUALITY CONTROL DATA
MS/MSD ANALYSIS

PROJECT: Jacobs Engineering Group
PROJECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: WC
% MOISTURE: 6.9

BATCH NO.: 96F041
SAMPLE ID: COMP-GROUP-C
CONTROL NO.: F041-CC
DATE RECEIVED: 06/13/96
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/25/96
ACCESSION: 96F041

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	150.00	269.00	291.00	52*	269.00	271.00	63	19	55-145	20

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT %
Tetrachloro-m-xylene	43.00	37.70	88	43.00	35.40	83	50-150
Decachlorobiphenyl	43.00	23.50	55	43.00	15.25	36*	50-150

* Out of QC limit

CKY QUALITY CONTROL DATA
MS/MSD ANALYSIS

CLIENT: Jacobs Engineering Group
PROJECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: BC
% MOISTURE: 0.1

BATCH NO.: 96F041
SAMPLE ID: COMP-GROUP-D
CONTROL NO.: F041-CD

DATE RECEIVED: 06/13/96
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/20/96

ACCESSION: 96F041

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	250.00	235.00	94	250.00	249.00	100	6	55-145	20

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT %
Tetrachloro-m-xylene	40.00	36.30	91	40.00	36.20	90	50-150
Decachlorobiphenyl	40.00	13.20	33*	40.00	15.50	39*	50-150

* Out of QC limit

211

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CKY

CKY QUALITY CONTROL DATA
MS/MSD ANALYSIS

IT: Jacobs Engineering Group
PROJECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: CC
% MOISTURE: 2.5

BATCH NO.: 96F041
SAMPLE ID: COMP-GROUP-E
CONTROL NO.: F041-CE

DATE RECEIVED: 06/13/96
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/20/96

ACCESSION: 96F041

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	ND	256.00	310.00	121	256.00	341.00	133	10	55-145	20

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT %
Tetrachloro-m-xylene	41.00	23.60	58	41.00	25.10	61	50-150
Decachlorobiphenyl	41.00	9.23	23*	41.00	12.30	30*	50-150

* Out of QC limit

220

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CKY QUALITY CONTROL DATA
MS/MSD ANALYSIS

IT: Jacobs Engineering Group
PROJECT: Tooele / 27H10319
METHOD: EPA 3540/8080
MATRIX: CC
% MOISTURE: 1.4

BATCH NO.: 96F041
SAMPLE ID: COMP-GROUP-G
CONTROL NO.: F041-CG

DATE RECEIVED: 06/13/96
DATE EXTRACTED: 06/14/96
DATE ANALYZED: 06/20/96

ACCESSION: 96F041

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	200.00	254.00	253.00	21*	254.00	225.00	10*	71*	55-145	20

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT %
Tetrachloro-m-xylene	40.60	27.60	68	40.60	25.25	62	50-150
Decachlorobiphenyl	40.60	9.66	24*	40.60	9.42	23*	50-150

* Out of QC limit

CKY QUALITY CONTROL DATA
MS/MSD ANALYSIS

IT: Jacobs Engineering Group
 CT: Tooele / 27H10319
 METHOD: EPA 3540/8080
 MATRIX: CC
 % MOISTURE: 1.4

BATCH NO.: 96F041
 SAMPLE ID: COMP-GROUP-G
 CONTROL NO.: F041-CGR

DATE RECEIVED: 06/13/96
 DATE EXTRACTED: 06/25/96
 DATE ANALYZED: 06/27/96

ACCESSION: 96F041

PARAMETER	SMPL RSLT (ug/kg)	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	RPD %	QC LIMIT %	RPD LIMIT %
Aroclor 1260	220.00	254.00	340.00	47*	254.00	360.00	55	15	55-145	20

SURROGATE PARAMETER	SPIKE AMT (ug/kg)	MS RSLT (ug/kg)	MS % REC	SPIKE AMT (ug/kg)	MSD RSLT (ug/kg)	MSD % REC	QC LIMIT %
Tetrachloro-m-xylene	40.60	30.60	75	40.60	30.90	76	50-150
Decachlorobiphenyl	40.60	18.50	46*	40.60	18.90	47*	50-150

* Out of QC limit

Ag given to Le. Schmitt
7/8/96



Curtis & Tompkins, Ltd., Analytical Laboratories, Since 1878

2323 Fifth Street, Berkeley, CA 94710, Phone (510) 486-0900

Carolyn Brizzolera
QA officer @ CT

COVER PAGE

Laboratory Number 125995

Army Corps of Engineers, SPDL
25 Liberty Ship Way
Sausalito, CA 94965-1768

Project#: 95-1034-04-057
Location: Tooele Bld. 659

Sample ID	Lab ID	JACOBS ID
96-1122QM4	125995-001	160 SR-01 DD
96-1123QM4	125995-002	161 SR-10 DD
96-1124QM4	125995-003	170 BC-14 DD
96-1125QM4	125995-004	171 CC-25 DD
96-1126QM4	125995-005	180 CC-29 DD
96-1127QM4	125995-006	181 CC-44 DD

I certify that this data package has been reviewed for technical correctness and completeness. Please see attached narrative for a discussion of any analytical problems related to this sample set. Release of this data has been authorized by the Laboratory Manager or the Manager's designee, as verified by the following signatures.

Signature: 
Title: Operations Manager

Date: 7-2-96

Signature: 
Title: Project Manager

Date: July 1, 96



X
Laboratory Number: 125995
Client: Army Corps of Engineers, SPDL
Project#: 95-1034-04-057
Location: Tooele Bld. 659

Sample Date: 06/08-11/96
Receipt Date: 06/14/96

CASE NARRATIVE

Curtis & Tompkins received six soil samples from the Tooele Bld. 659 site on June 14, 1996 for the PCBs analysis. All samples were received cold and intact. The following analytical problems were encountered for this data set:

PCBs (EPA 8080): High DCB surrogate recoveries were observed for samples 96-1123QM4 (C&T# 125995-002), 96-1124QM4 (C&T# 125995-003) and 96-1127QM4 (C&T# 125995-006) due to matrix interferences. Surrogates for sample 96-1125QM4 (C&T# 125995-004) were diluted out. Both surrogate recoveries for the LCS were also high outside the AOCE limits, but within the control chart limits ~~fo~~ 60-150% for TCMX and 61-143% for DCB. The MS/MSD passed all acceptance criteria. *above*

No other analytical problems were encountered for this data set.



CHAIN OF CUSTODY RECORD

USE A BALLPOINT PEN, BLACK INK, AND PRESS FIRMLY. INSTRUCTIONS ARE ON THE BACK

PROJECT NAME: TOOBLE / Illum / DEPOT 659					LABORATORY NAME & ADDRESS: F-1 MAX					
PROJECT NUMBER: 27-11/103-19					630 maple AVE.					
WBS CODE:										
SAMPLE NUMBER	COLLECTION DATE	TIME	SAMPLER'S INITIALS	NUMBER OF CONTAINERS	CONTAINER SIZE AND TYPE	PRESERVATIVE	MATRIX CODE	ANALYSES REQUESTED	CC	CONDITION ON RECEIPT
P.C.B. 1	9/2/96	12:00	AS	1	1 L / 110m	none	A)	P.C.B.'s		
[A large diagonal line is drawn across the remaining rows of the table.]										
COMMENTS:										
[The following section contains a table for tracking sample collection and return.]										
COLLECTED & RELEASED BY: Dayle Buel			DATE: 9/2/96	TIME: 10:00	TURNAROUND TIME			DATE: 11	TIME: :	
RECEIVED BY: F.R.D-X			DATE: 8/11/96	TIME: 10:00	RELINQUISHED BY			DATE: 11	TIME: :	
RECORD RETURNED BY			DATE: 11	TIME: :	SHIPPING NUMBER: 3405973381			DATE: 11	TIME: :	

**INFORMATION IN THIS SECTION
FOR JACOBS USE ONLY**

[illegible]

TOTAL P.02

along with contract number on invoice. Each call number amount should not

PCBs		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
Field ID: 96-1122QM4	Sampled:	06/11/96
Lab ID: 125995-001	Received:	06/14/96
Matrix: Miscell.	Extracted:	06/22/96
Batch#: 28356	Analyzed:	06/25/96
Units: ug/Kg dry weight	Moisture:	8%
Diln Fac: 1		
Analyte	Result	Reporting Limit
Aroclor-1016	ND	17
Aroclor-1221	ND	17
Aroclor-1232	ND	17
Aroclor-1242	ND	17
Aroclor-1248	ND	17
Aroclor-1254	ND	17
Aroclor-1260	ND	17
Surrogate	%Recovery	Recovery Limits
TCMX	111	65-135
Decachlorobiphenyl	118	65-135



PCBs		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
Field ID: 96-1123QM4	Sampled:	06/11/96
Lab ID: 125995-002	Received:	06/14/96
Matrix: Miscell.	Extracted:	06/22/96
Batch#: 28356	Analyzed:	06/26/96
Units: ug/Kg dry weight	Moisture:	7%
Diln Fac: 1		
Analyte	Result	Reporting Limit
Aroclor-1016	ND	17
Aroclor-1221	ND	17
Aroclor-1232	ND	17
Aroclor-1242	130	17
Aroclor-1248	ND	17
Aroclor-1254	100	17
Aroclor-1260	320	17
Surrogate	%Recovery	Recovery Limits
TCMX	121	65-135
Decachlorobiphenyl	136*	65-135

* Values outside of QC limits

005
193

PCBs		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
Field ID: 96-1124QM4	Sampled:	06/11/96
Lab ID: 125995-003	Received:	06/14/96
Matrix: Miscell.	Extracted:	06/22/96
Batch#: 28356	Analyzed:	06/26/96
Units: ug/Kg dry weight	Moisture:	0%
Diln Fac: 1		
Analyte	Result	Reporting Limit
Aroclor-1016	ND	16
Aroclor-1221	ND	16
Aroclor-1232	ND	16
Aroclor-1242	ND	16
Aroclor-1248	ND	16
Aroclor-1254	ND	16
Aroclor-1260	ND	16
Surrogate	%Recovery	Recovery Limits
TCMX	109	65-135
Decachlorobiphenyl	197*	65-135

* Values outside of QC limits

000
194

PCBs		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
Field ID: 96-1125QM4	Sampled:	06/08/96
Lab ID: 125995-004	Received:	06/14/96
Matrix: Miscell.	Extracted:	06/22/96
Batch#: 28356	Analyzed:	06/26/96
Units: ug/Kg dry weight	Moisture:	2%
Diln Fac: 50		
Analyte	Result	Reporting Limit
Aroclor-1016	ND	820
Aroclor-1221	ND	820
Aroclor-1232	ND	820
Aroclor-1242	ND	820
Aroclor-1248	ND	820
Aroclor-1254	6300	820
Aroclor-1260	840	820
Surrogate	%Recovery	Recovery Limits
TCMX	DO*	65-135
Decachlorobiphenyl	DO*	65-135

* Values outside of QC limits
DO: Surrogate diluted out



PCBs		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
Field ID: 96-1126QM4	Sampled:	06/10/96
Lab ID: 125995-005	Received:	06/14/96
Matrix: Miscell.	Extracted:	06/22/96
Batch#: 28356	Analyzed:	06/26/96
Units: ug/Kg dry weight	Moisture:	1%
Diln Fac: 1		
Analyte	Result	Reporting Limit
Aroclor-1016	ND	16
Aroclor-1221	ND	16
Aroclor-1232	ND	16
Aroclor-1242	110	16
Aroclor-1248	ND	16
Aroclor-1254	160	16
Aroclor-1260	150	16
Surrogate	%Recovery	Recovery Limits
TCMX	124	65-135
Decachlorobiphenyl	105	65-135



PCBs		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
Field ID: 96-1127QM4	Sampled:	06/11/96
Lab ID: 125995-006	Received:	06/14/96
Matrix: Miscell.	Extracted:	06/22/96
Batch#: 28356	Analyzed:	06/22/96
Units: ug/Kg dry weight	Moisture:	2%
Diln Fac: 1		
Analyte	Result	Reporting Limit
Aroclor-1016	ND	16
Aroclor-1221	ND	16
Aroclor-1232	ND	16
Aroclor-1242	110	16
Aroclor-1248	ND	16
Aroclor-1254	54	16
Aroclor-1260	57	16
Surrogate	%Recovery	Recovery Limits
TCMX	130	65-135
Decachlorobiphenyl	150*	65-135

* Values outside of QC limits



Lab #: 125995

BATCH QC REPORT

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Polychlorinated Biphenyls		
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB	
Project#: 95-1034-04-057	Prep Method: EPA 3550	
Location: Tooele Bld. 659	Cleanup Method: EPA ACID	
METHOD BLANK		
Matrix: Miscell.	Prep Date:	06/22/96
Batch#: 28356	Analysis Date:	06/26/96
Units: ug/Kg		
Diln Fac: 1		

MB Lab ID: QC24933

Analyte	Result	Reporting Limit
Aroclor-1016	ND	20
Aroclor-1221	ND	20
Aroclor-1232	ND	20
Aroclor-1242	ND	20
Aroclor-1248	ND	20
Aroclor-1254	ND	20
Aroclor-1260	ND	20
Surrogate	%Rec	Recovery Limits
TCMX	121	65-135
Decachlorobiphenyl	126	65-135

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Lab #: 125995

BATCH QC REPORT

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Polychlorinated Biphenyls

Client: Army Corps of Engineers, SPDL
Project#: 95-1034-04-057
Location: Tooele Bld. 659

Analysis Method: PCB
Prep Method: EPA 3550
Cleanup Method: EPA ACID

MATRIX SPIKE/MATRIX SPIKE DUPLICATE

Field ID: 96-1124QM4
Lab ID: 125995-003
Matrix: Miscell.
Batch#: 28356
Units: ug/Kg dry weight
Diln Fac: 1

Sample Date: 06/11/96
Received Date: 06/14/96
Prep Date: 06/22/96
Analysis Date: 06/26/96
Moisture: 0%

MS Lab ID: QC24935

Analyte	Spike Added	Sample	MS	%Rec #	Limits
Aroclor-1260	180	<16.00	132.6	74	65-135
Surrogate	%Rec	Limits			
TCMX	125	65-135			
Decachlorobiphenyl	124	65-135			

MSD Lab ID: QC24936

Analyte	Spike Added	MSD	%Rec #	Limits	RPD #	Limit
Aroclor-1260	180	129.6	72	65-135	2	<25
Surrogate	%Rec	Limits				
TCMX	125	65-135				
Decachlorobiphenyl	124	65-135				

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

RPD: 0 out of 1 outside limits

Spike Recovery: 0 out of 2 outside limits

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Lab #: 125995

BATCH QC REPORT

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Polychlorinated Biphenyls			
Client: Army Corps of Engineers, SPDL	Analysis Method: PCB		
Project#: 95-1034-04-057	Prep Method: EPA 3550		
Location: Tooele Bld. 659	Cleanup Method: EPA ACID		
LABORATORY CONTROL SAMPLE			
Matrix: Miscell.	Prep Date:	06/22/96	
Batch#: 28356	Analysis Date:	06/26/96	
Units: ug/Kg			
Diln Fac: 1			

LCS Lab ID: QC24934

Analyte	Result	Spike Added	%Rec #	Limits
Aroclor-1260	127	176	72	65-135
Surrogate	%Rec	Limits		
TCMX	138 *	65-135		
Decachlorobiphenyl	139 *	65-135		

Column to be used to flag recovery and RPD values with an asterisk

* Values outside of QC limits

Spike Recovery: 0 out of 1 outside limits

012

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